

Inter-Office Memorandum



TO: Tom Carlisle

cc: John Mooney

FROM: Sharon Nordstrom *SN*
PROJECT: GMC - Fisher Guide
SUBJECT: PCB Data Report

DATE: 22 July, 1988
W.O. NO.: 1138-41-01

ACTION:

Attached is our data report for the water and sediment samples submitted for analysis on 7-7-88. Please note that the sediment samples are reported on a dry weight basis. If you should have any questions regarding our report, please give me a call.

RECEIVED
JUL 25 1988

ROY F. WESTON, INC.
CHICAGO OFFICE

WESTON ANALYTICS
PCB ANALYTICAL DATA PACKAGE FOR
GMC-FISHER GUIDE

DATE RECEIVED: 07/07/88

RFW LOT # :8807-920

CLIENT ID	RFW #	MTX	PREP #	COLLECTION	EXTR/PREP	ANALYSIS
GM-PW1-01D LAGOON WA	001	W	88E744	07/06/88	07/08/88	07/12/88
GM-FB-01	002	W	88E744	07/06/88	07/08/88	07/12/88
GM-PW1-01	003	W	88E744	07/06/88	07/08/88	07/13/88
GM-PW2-01	004	W	88E744	07/06/88	07/08/88	07/12/88
GM-FILTRATE	005	W	88E744	07/06/88	07/08/88	07/13/88
GM-P1-5A	006	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-7B	007	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-7B	007 MS	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-7B	007 MSD	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-5B	008	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-5B DUP	009	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-6A	010	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P2-2AB	011	SE	88E745	07/06/88	07/08/88	07/13/88
GM-P2-3A	012	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P2-3A	012 REP	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-3A	013	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P2-1B	014	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P2-3B	015	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P2-2A	016	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-2A	017	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-9A	018	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-6C	019	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-10A	020	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-9C	021	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-5C	022	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-7C	023	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-8A	024	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-8C	025	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-9B	026	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-10C	027	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-8B	028	SE	88E746	07/06/88	07/08/88	07/14/88
GM-P1-4C	029	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-4C	029 REP	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-4A	030	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-3B	031	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-3B	031 MS	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-3B	031 MSD	SE	88E746	07/06/88	07/08/88	07/15/88

LAB QC:

PBLK	MB1	W	88E744	N/A	07/08/88	07/13/88
PBLK	MB1 BS	W	88E744	N/A	07/08/88	07/13/88
PBLK	MB1 BSD	W	88E744	N/A	07/08/88	07/13/88



Fisher Guide Division
General Motors Corporation

1000 Town Line Road
Syracuse, New York 13221-4869

ENVIRONMENTAL
PROTECTION AGENCY
REGION II

Syracuse Plant

November 30, 1988

88 NOV 31 AM 10:25

HAZARDOUS WASTE
FACILITIES BRANCH



Mr. Luis Negrón
Project Engineer
United States Environmental Protection Agency
Region II
New York Facilities Section
Hazardous Waste Facilities Branch
New York, New York 10278

Dear Mr. Negrón:

Please find attached a completed Environmental Assessment form for the Fisher Guide Division Syracuse Plant impoundment closure activity as requested in the correspondence from Mr. Frank A. Langone on Nov. 10, 1988.

If you should have any questions, please contact William E. Kochem at 315-432-5314.

Very truly yours,
FISHER GUIDE DIVISION
General Motors Corporation

Richard J. Larkin
Manager
Manufacturing Engineering

cc: P.R. Counterman- DEC
W.E. Kochem

617.21
Appendix A

SEQR

State Environmental Quality Review
FULL ENVIRONMENTAL ASSESSMENT FORM

Purpose: The full EAF is designed to help applicants and agencies determine, in an orderly manner, whether a project or action may be significant. The question of whether an action may be significant is not always easy to answer. Frequently, there are aspects of a project that are subjective or unmeasurable. It is also understood that those who determine significance may have little or no formal knowledge of the environment or may be technically expert in environmental analysis. In addition, many who have knowledge in one particular area may not be aware of the broader concerns affecting the question of significance.

The full EAF is intended to provide a method whereby applicants and agencies can be assured that the determination process has been orderly, comprehensive in nature, yet flexible to allow introduction of information to fit a project or action.

Full EAF Components: The full EAF is comprised of three parts:

- Part 1:** Provides objective data and information about a given project and its site. By identifying basic project data, it assists a reviewer in the analysis that takes place in Parts 2 and 3.
- Part 2:** Focuses on identifying the range of possible impacts that may occur from a project or action. It provides guidance as to whether an impact is likely to be considered small to moderate or whether it is a potentially-large impact. The form also identifies whether an impact can be mitigated or reduced.
- Part 3:** If any impact in Part 2 is identified as potentially-large, then Part 3 is used to evaluate whether or not the impact is actually important.

DETERMINATION OF SIGNIFICANCE—Type 1 and Unlisted Actions

Identify the Portions of EAF completed for this project: ☐ Part 1 ☐ Part 2 ☐ Part 3

Upon review of the information recorded on this EAF (Parts 1 and 2 and 3 if appropriate), and any other supporting information, and considering both the magnitude and importance of each impact, it is reasonably determined by the lead agency that:

- ☐ A. The project will not result in any large and important impact(s) and, therefore, is one which will not have a significant impact on the environment, therefore a **negative declaration will be prepared.**
- ☐ B. Although the project could have a significant effect on the environment, there will not be a significant effect for this Unlisted Action because the mitigation measures described in PART 3 have been required, therefore a **CONDITIONED negative declaration will be prepared.***
- ☐ C. The project may result in one or more large and important impacts that may have a significant impact on the environment, therefore a **positive declaration will be prepared.**
- * A Conditioned Negative Declaration is only valid for Unlisted Actions

 Name of Action

 Name of Lead Agency

 Signature of Responsible Officer in Lead Agency

 Signature of Preparer (If different from responsible officer)

PART 1—PROJECT INFORMATION

Prepared by Project Sponsor

NOTICE: This document is designed to assist in determining whether the action proposed may have a significant effect on the environment. Please complete the entire form, Parts A through E. Answers to these questions will be considered as part of the application for approval and may be subject to further verification and public review. Provide any additional information you believe will be needed to complete Parts 2 and 3.

It is expected that completion of the full EAF will be dependent on information currently available and will not involve new studies, research or investigation. If information requiring such additional work is unavailable, so indicate and specify each instance.

NAME OF ACTION <u>Impoundment Closure</u>		
LOCATION OF ACTION (Include Street Address, Municipality and County) <u>1000 Town Line Road, Syracuse, New York Onondaga County</u>		
NAME OF APPLICANT/SPONSOR <u>Fisher Guide Division, General Motors Corporation</u>		BUSINESS TELEPHONE <u>(315) 432-5206</u>
ADDRESS <u>1000 Town Line Road</u>		
CITY/PO <u>P.O. Box 4869, Syracuse</u>	STATE <u>N.Y.</u>	ZIP CODE <u>13221</u>
NAME OF OWNER (If different)		BUSINESS TELEPHONE <u>()</u>
ADDRESS		
CITY/PO	STATE	ZIP CODE
DESCRIPTION OF ACTION <u>Closure of (2) surface impoundments #1 and #2.</u>		

Please Complete Each Question—Indicate N.A. if not applicable

A. Site Description

Physical setting of overall project, both developed and undeveloped areas.

1. Present land use: ☐ Urban ☐ Industrial ☒ Commercial ☐ Residential (suburban) ☐ Rural (non-farm)
☐ Forest ☐ Agriculture ☐ Other _____

2. Total acreage of project area: 84 acres.

APPROXIMATE ACREAGE

	PRESENTLY	AFTER COMPLETION
Meadow or Brushland (Non-agricultural)	_____ acres	_____ acres
Forested	_____ acres	_____ acres
Agricultural (Includes orchards, cropland, pasture, etc.)	_____ acres	_____ acres
Wetland (Freshwater or tidal as per Articles 24, 25 of ECL)	_____ acres	_____ acres
Water Surface Area	_____ acres	_____ acres
Unvegetated (Rock, earth or fill)	_____ acres	_____ acres
Roads, buildings and other paved surfaces	<u>35</u> acres	<u>35</u> acres
Other (Indicate type) <u>lawns, fill</u>	<u>49</u> acres	<u>49</u> acres

3. What is predominant soil type(s) on project site? Silts, sandy silts and clay

a. Soil drainage: ☐ Well drained _____ % of site ☒ Moderately well drained 100 % of site

- b. If any agricultural land is involved, how many acres of soil are classified within soil group 1 through 4 of the NYS Land Classification System? _____ acres. (See 1 NYCRR 370).

Are there bedrock outcroppings on project site? ☐ Yes ☒ No

- a. What is depth to bedrock? >20 (in feet)

5. Approximate percentage of proposed project site with slopes: ☒ 0-10% 100 % ☐ 10-15% _____ %
☐ 15% or greater _____ %
6. Is project substantially contiguous to, or contain a building, site, or district, listed on the State or the National Registers of Historic Places? ☐ Yes ☒ No
7. Is project substantially contiguous to a site listed on the Register of National Natural Landmarks? ☐ Yes ☒ No
8. What is the depth of the water table? 3-10 (in feet)
9. Is site located over a primary, principal, or sole source aquifer? ☐ Yes ☒ No
10. Do hunting, fishing or shell fishing opportunities presently exist in the project area? ☐ Yes ☒ No
11. Does project site contain any species of plant or animal life that is identified as threatened or endangered?
☐ Yes ☒ No According to _____
 Identify each species _____
12. Are there any unique or unusual land forms on the project site? (i.e., cliffs, dunes, other geological formations)
☐ Yes ☒ No Describe _____
13. Is the project site presently used by the community or neighborhood as an open space or recreation area?
☐ Yes ☒ No If yes, explain _____
14. Does the present site include scenic views known to be important to the community?
☐ Yes ☒ No
15. Streams within or contiguous to project area: _____
 a. Name of Stream and name of River to which it is tributary Ley Creek
16. Lakes, ponds, wetland areas within or contiguous to project area:
 a. Name N/A b. Size (In acres) _____
17. Is the site served by existing public utilities? ☒ Yes ☐ No
 a) If Yes, does sufficient capacity exist to allow connection? ☒ Yes ☐ No
 b) If Yes, will improvements be necessary to allow connection? ☒ Yes ☐ No
18. Is the site located in an agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? ☐ Yes ☒ No
19. Is the site located in or substantially contiguous to a Critical Environmental Area designated pursuant to Article 8 of the ECL, and 6 NYCRR 617? ☐ Yes ☒ No
20. Has the site ever been used for the disposal of solid or hazardous wastes? ☐ Yes ☒ No

B. Project Description

1. Physical dimensions and scale of project (fill in dimensions as appropriate)
- a. Total contiguous acreage owned or controlled by project sponsor 84 acres.
- b. Project acreage to be developed: _____ acres initially; _____ acres ultimately.
- c. Project acreage to remain undeveloped _____ acres.
- d. Length of project, in miles: N/A (If appropriate) :
- e. If the project is an expansion, indicate percent of expansion proposed _____ %;
- f. Number of off-street parking spaces existing N/A; proposed N/A.
- g. Maximum vehicular trips generated per hour N/A (upon completion of project)
- h. If residential, Number of types of housing units:
- | | One Family | Two Family | Multiple Family | Condominium |
|------------|------------|------------|-----------------|-------------|
| Initially | <u>N/A</u> | _____ | _____ | _____ |
| Ultimately | <u>N/A</u> | _____ | _____ | _____ |
- i. Dimensions (in feet) of largest proposed structure N/A height; _____ width; _____ length

2. How much natural material (i.e., rock, earth, etc.) will be removed from the site? 100 tons/cubic yards
3. Will disturbed areas be reclaimed? ☒ Yes ☐ No ☐ N/A
- a. If yes, for what intended purpose is the site being reclaimed? Site grading/possible future building
- b. Will topsoil be stockpiled for reclamation? ☐ Yes ☒ No
- c. Will upper subsoil be stockpiled for reclamation? ☐ Yes ☒ No
4. How many acres of vegetation (trees, shrubs, ground covers) will be removed from site? 0 acres.
5. Will any mature forest (over 100 years old) or other locally-important vegetation be removed by this project?
☐ Yes ☒ No
6. If single phase project: Anticipated period of construction 4 months, (including demolition).
7. If multi-phased:
- a. Total number of phases anticipated N/A (number).
- b. Anticipated date of commencement phase 1 - month - year, (including demolition).
- c. Approximate completion date of final phase - month - year.
- d. Is phase 1 functionally dependent on subsequent phases? ☐ Yes ☐ No
8. Will blasting occur during construction? ☐ Yes ☒ No
9. Number of jobs generated: during construction 10; after project is complete 0.
10. Number of jobs eliminated by this project 0.
11. Will project require relocation of any projects or facilities? ☐ Yes ☐ No If yes, explain _____
12. Is surface liquid waste disposal involved? ☒ Yes ☐ No
- a. If yes, indicate type of waste (sewage, industrial, etc.) and amount 150,000 Gallons, Industrial & water storm
- b. Name of water body into which effluent will be discharged Onondaga County POTW via Plant Waste Plant
13. Is subsurface liquid waste disposal involved? ☐ Yes ☒ No Type _____
14. Will surface area of an existing water body increase or decrease by proposal? ☐ Yes ☒ No
Explain _____
15. Is project or any portion of project located in a 100 year flood plain? ☐ Yes ☒ No
16. Will the project generate solid waste? ☒ Yes ☐ No
- a. If yes, what is the amount per month 1000 tons
- b. If yes, will an existing solid waste facility be used? ☒ Yes ☐ No
- c. If yes, give name CWM-Incinerator, Chicago; Ensco Incineration, CWM, Model City, N.Y.
Aptus Incineration-Kansas location _____
- d. Will any wastes not go into a sewage disposal system or into a sanitary landfill? ☒ Yes ☐ No
- e. If Yes, explain Incineration of waste containing PCB's > 500 ppm
17. Will the project involve the disposal of solid waste? ☐ Yes ☒ No
- a. If yes, what is the anticipated rate of disposal? _____ tons/month.
- b. If yes, what is the anticipated site life? _____ years.
18. Will project use herbicides or pesticides? ☐ Yes ☒ No
19. Will project routinely produce odors (more than one hour per day)? ☐ Yes ☒ No
20. Will project produce operating noise exceeding the local ambient noise levels? ☐ Yes ☒ No
21. Will project result in an increase in energy use? ☐ Yes ☒ No
22. If water supply is from wells, indicate pumping capacity N/A gallons/minute.
23. Total anticipated water usage per day N/A gallons/day.
24. Does project involve Local, State or Federal funding? ☐ Yes ☒ No
If Yes, explain _____

25. Approvals Required:

	Type	Submittal Date
City, Town, Village Board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
City, Town, Village Planning Board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Town of Salina Excavation Fill Permit N/S
City, Town Zoning Board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
City, County Health Department	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Discharge to POTW, Onondaga County N/S
Other Local Agencies	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other Regional Agencies	<input type="checkbox"/> Yes <input type="checkbox"/> No	
State Agencies	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	New York State D.E.C. 6/87
Federal Agencies	<input type="checkbox"/> Yes <input type="checkbox"/> No	

C. Zoning and Planning Information

- Does proposed action involve a planning or zoning decision? ☒ Yes ☐ No
If Yes, indicate decision required:
☐ zoning amendment ☐ zoning variance ☐ special use permit ☐ subdivision ☐ site plan
☐ new/revision of master plan ☐ resource management plan ☒ other Fill Excavation Permit
- What is the zoning classification(s) of the site? Commercial
- What is the maximum potential development of the site if developed as permitted by the present zoning?
N/A
- What is the proposed zoning of the site? N/A
- What is the maximum potential development of the site if developed as permitted by the proposed zoning?
N/A
- Is the proposed action consistent with the recommended uses in adopted local land use plans? ☒ Yes ☐ No
- What are the predominant land use(s) and zoning classifications within a ¼ mile radius of proposed action?
Commercial
- Is the proposed action compatible with adjoining/surrounding land uses within a ¼ mile? ☒ Yes ☐ No
- If the proposed action is the subdivision of land, how many lots are proposed? N/A
a. What is the minimum lot size proposed? _____
- Will proposed action require any authorization(s) for the formation of sewer or water districts? ☐ Yes ☒ No
- Will the proposed action create a demand for any community provided services (recreation, education, police, fire protection)? ☐ Yes ☒ No
a. If yes, is existing capacity sufficient to handle projected demand? ☐ Yes ☐ No
- Will the proposed action result in the generation of traffic significantly above present levels? ☐ Yes ☒ No
a. If yes, is the existing road network adequate to handle the additional traffic? ☐ Yes ☐ No

D. Informational Details

Attach any additional information as may be needed to clarify your project. If there are or may be any adverse impacts associated with your proposal, please discuss such impacts and the measures which you propose to mitigate or avoid them.

Verification

I certify that the information provided above is true to the best of my knowledge.

Applicant/Sponsor Name Richard J. Larkin Date November 30, 1988
Signature Richard J. Larkin Title Manager, Manufacturing Engineering
If the action is in the Coastal Area, and you are a state agency, complete the Coastal Assessment Form before this action.

Part 2—PROJECT IMPACTS AND THEIR MAGNITUDE

Responsibility of Lead Agency

General Information (Read Carefully)

- In completing the form the reviewer should be guided by the question: Have my responses and determinations been reasonable? The reviewer is not expected to be an expert environmental analyst.
- Identifying that an impact will be potentially large (column 2) does not mean that it is also necessarily significant. Any large impact must be evaluated in PART 3 to determine significance. Identifying an impact in column 2 simply asks that it be looked at further.
- The Examples provided are to assist the reviewer by showing types of impacts and wherever possible the threshold of magnitude that would trigger a response in column 2. The examples are generally applicable throughout the State and for most situations. But, for any specific project or site other examples and/or lower thresholds may be appropriate for a Potential Large Impact response, thus requiring evaluation in Part 3.
- The impacts of each project, on each site, in each locality, will vary. Therefore, the examples are illustrative and have been offered as guidance. They do not constitute an exhaustive list of impacts and thresholds to answer each question.
- The number of examples per question does not indicate the importance of each question.
- In identifying impacts, consider long term, short term and cumulative effects.

Instructions (Read carefully)

- Answer each of the 19 questions in PART 2. Answer Yes if there will be any impact.
- Maybe answers should be considered as Yes answers.
- If answering Yes to a question then check the appropriate box (column 1 or 2) to indicate the potential size of the impact. If impact threshold equals or exceeds any example provided, check column 2. If impact will occur but threshold is lower than example, check column 1.
- If reviewer has doubt about size of the impact then consider the impact as potentially large and proceed to PART 3.
- If a potentially large impact checked in column 2 can be mitigated by change(s) in the project to a small to moderate impact, also check the Yes box in column 3. A No response indicates that such a reduction is not possible. This must be explained in Part 3.

IMPACT ON LAND

- Will the proposed action result in a physical change to the project site?
☐ NO ☒ YES

Examples that would apply to column 2

- Any construction on slopes of 15% or greater, (15 foot rise per 100 foot of length), or where the general slopes in the project area exceed 10%.
- Construction on land where the depth to the water table is less than 3 feet.
- Construction of paved parking area for 1,000 or more vehicles.
- Construction on land where bedrock is exposed or generally within 3 feet of existing ground surface.
- Construction that will continue for more than 1 year or involve more than one phase or stage.
- Excavation for mining purposes that would remove more than 1,000 tons of natural material (i.e., rock or soil) per year.
- Construction or expansion of a sanitary landfill.
- Construction in a designated floodway.
- Other impacts Closure of surface impoundment
Use 1500-2000 yds. soil containing avg. 6.3 ppm PCB's

- Will there be an effect to any unique or unusual land forms found on the site? (i.e., cliffs, dunes, geological formations, etc.) ☒ NO ☐ YES

- Specific land forms: _____

1 Small to Moderate Impact	2 Potential Large Impact	3 Can Impact Be Mitigated By Project Change
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No

IMPACT ON WATER

- Will proposed action affect any water body designated as protected?
(Under Articles 15, 24, 25 of the Environmental Conservation Law, ECL)
☒ NO ☐ YES

Examples that would apply to column 2

- » Developable area of site contains a protected water body.
- » Dredging more than 100 cubic yards of material from channel of a protected stream.
- » Extension of utility distribution facilities through a protected water body.
- » Construction in a designated freshwater or tidal wetland.
- » Other impacts: _____

1. Will proposed action affect any non-protected existing or new body of water? ☒ NO ☐ YES

Examples that would apply to column 2

- A 10% increase or decrease in the surface area of any body of water or more than a 10 acre increase or decrease.
- Construction of a body of water that exceeds 10 acres of surface area.
- Other impacts: _____

- i. Will Proposed Action affect surface or groundwater quality or quantity? ☐ NO ☒ YES

Examples that would apply to column 2

- Proposed Action will require a discharge permit.
 - Proposed Action requires use of a source of water that does not have approval to serve proposed (project) action.
 - Proposed Action requires water supply from wells with greater than 45 gallons per minute pumping capacity.
 - Construction or operation causing any contamination of a water supply system.
 - Proposed Action will adversely affect groundwater.
 - Liquid effluent will be conveyed off the site to facilities which presently do not exist or have inadequate capacity.
 - Proposed Action would use water in excess of 20,000 gallons per day.
 - Proposed Action will likely cause siltation or other discharge into an existing body of water to the extent that there will be an obvious visual contrast to natural conditions.
 - Proposed Action will require the storage of petroleum or chemical products greater than 1,100 gallons.
 - Proposed Action will allow residential uses in areas without water and/or sewer services.
 - Proposed Action locates commercial and/or industrial uses which may require new or expansion of existing waste treatment and/or storage facilities.
- Other impacts: _____

- Will proposed action alter drainage flow or patterns, or surface water runoff? ☐ NO ☒ YES

[illegible]

- [illegible]

- Proposed land uses, or project components obviously different from or in sharp contrast to current surrounding land use patterns, whether man-made or natural.
- Proposed land uses, or project components visible to users of aesthetic resources which will eliminate or significantly reduce their enjoyment of the aesthetic qualities of that resource.
- Project components that will result in the elimination or significant screening of scenic views known to be important to the area.
- Other impacts: _____

- Proposed Action occurring wholly or partially within or substantially contiguous to any facility or site listed on the State or National Register of historic places.
- Any impact to an archaeological site or fossil bed located within the project site.
- Proposed Action will occur in an area designated as sensitive for archaeological sites on the NYS Site Inventory.
- Other impacts: _____

- The permanent foreclosure of a future recreational opportunity.
- A major reduction of an open space important to the community.
- Other impacts: _____

IMPACT ON TRANSPORTATION

14. Will there be an effect to existing transportation systems?
 Examples that would apply to column 2 ☒ NO ☐ YES

Examples that would apply to column 2

- Alteration of present patterns of movement of people and/or goods.
- Proposed Action will result in major traffic problems.
- Other impacts: _____

IMPACT ON ENERGY

15. Will proposed action affect the community's sources of fuel or energy supply? ☒ NO ☐ YES
Examples that would apply to action: _____

Examples that would apply to column 2

- Proposed Action will cause a greater than 5% increase in the use of any form of energy in the municipality.
- Proposed Action will require the creation or extension of an energy transmission or supply system to serve more than 50 single or two family residences or to serve a major commercial or industrial use.
- Other impacts: _____

NOISE AND ODOR IMPACTS

16. Will there be objectionable odors, noise, or vibration as a result of the Proposed Action? ☒ NO ☐ YES
Examples that would create objectionable odors, noise, or vibration:

Examples that would apply to column 2

- Blasting within 1,500 feet of a hospital, school or other sensitive facility.
- Odors will occur routinely (more than one hour per day).
- Proposed Action will produce operating noise exceeding the local ambient noise levels for noise outside of structures.
- Proposed Action will remove natural barriers that would act as a noise screen.
- Other impacts: _____

IMPACT ON PUBLIC HEALTH

17. Will Proposed Action affect public health and safety?
 Examples that would apply to this project: ☐ NO ☒ YES

Examples that would apply to column 2

- Proposed Action may cause a risk of explosion or release of hazardous substances (i.e. oil, pesticides, chemicals, radiation, etc.) in the event of accident or upset conditions, or there may be a chronic low level discharge or emission.
- Proposed Action may result in the burial of "hazardous wastes" in any form (i.e. toxic, poisonous, highly reactive, radioactive, irritating, infectious, etc.)
- Storage facilities for one million or more gallons of liquified natural gas or other flammable liquids.
- Proposed action may result in the excavation or other disturbance within 2,000 feet of a site used for the disposal of solid or hazardous waste.
- Other impacts: _____

1 Small to Moderate Impact	2 Potential Large Impact	3 Can Impact Be Mitigated By Project Change	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

IMPACT ON GROWTH AND CHARACTER OF COMMUNITY OR NEIGHBORHOOD

18. Will proposed action affect the character of the existing community?
☒ NO ☐ YES

Examples that would apply to column 2

- The permanent population of the city, town or village in which the project is located is likely to grow by more than 5%.
- The municipal budget for capital expenditures or operating services will increase by more than 5% per year as a result of this project.
- Proposed action will conflict with officially adopted plans or goals.
- Proposed action will cause a change in the density of land use.
- Proposed Action will replace or eliminate existing facilities, structures or areas of historic importance to the community.
- Development will create a demand for additional community services (e.g. schools, police and fire, etc.)
- Proposed Action will set an important precedent for future projects.
- Proposed Action will create or eliminate employment.
- Other impacts: _____

1 Small to Moderate Impact	2 Potential Large Impact	3 Can Impact Be Mitigated By Project Change
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Yes <input type="checkbox"/> No

19. Is there, or is there likely to be, public controversy related to potential adverse environmental impacts?
☐ NO ☒ YES

**If Any Action in Part 2 Is Identified as a Potential Large Impact or
If You Cannot Determine the Magnitude of Impact, Proceed to Part 3**

Part 3—EVALUATION OF THE IMPORTANCE OF IMPACTS

Responsibility of Lead Agency

Part 3 must be prepared if one or more impact(s) is considered to be potentially large, even if the impact(s) may be mitigated.

Instructions

Discuss the following for each impact identified in Column 2 of Part 2:

1. Briefly describe the impact.
2. Describe (if applicable) how the impact could be mitigated or reduced to a small to moderate impact by project change(s).
3. Based on the information available, decide if it is reasonable to conclude that this impact is important.

To answer the question of importance, consider:

- The probability of the impact occurring
- The duration of the impact
- Its irreversibility, including permanently lost resources of value
- Whether the impact can or will be controlled
- The regional consequence of the impact
- Its potential divergence from local needs and goals
- Whether known objections to the project relate to this impact.

(Continue on attachments)



Fisher Guide Division

1000 Town Line Road

General Motors Corporation

Syracuse, New York 13221-4869

Syracuse Plant

RECEIVED

AUG 29 1988

Bureau of Hazardous Waste
Facility Permitting
Division of Hazardous
Substances Regulation

PEL: ER88-076

August 26, 1988

Mr. Paul R. Counterman, P.E., Director
Bureau of Hazardous Waste Facility Permitting
Division of Hazardous Substances Regulation
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233

Re: Surface Impoundment Closure Plan
EPA ID NY002239440

Dear Mr. Counterman:

We are in receipt of your letter of July 15, 1988, commenting on the third draft of the closure plan, dated April, 1988, which was forwarded to you under cover of our letter of May 10, 1988. This draft followed a face-to-face technical meeting between our consultants and Department representatives in Albany on March 23, 1988 and the understanding reached were noted in our letter to you of March 30, 1988. Later informal discussions with representatives of your staff led us to believe that any further revisions required to be made to the plan would be few in number and minor in scope.

Given the foregoing, it was discouraging to find that NYDEC had over 40 comments on this latest draft. Many of the comments could have been made on earlier drafts of the plan and several of the comments have no technical or regulatory justification.

Fisher Guide remains committed to the process for gaining approval of a closure plan, and to that end, has submitted the enclosed addendum, responding to NYDEC's comments.

Paul R. Counterman, P.E.
August 26, 1988
Page 2

We would like to have a meeting on this matter as soon as possible after Labor Day. At this meeting, we want to address any remaining concerns and resolve certain disposal issues arising from the results of our recent recharacterization of the impoundment sediments.

As to the latter item, it was agreed at the March 23, 1988 Albany meeting that the NYDEC's demand for recharacterization of the sediments would be limited to re-sampling for PCBs. To accelerate the project, the work was performed in early July. Michael McPeck, an Engineer in NYDEC's Region 7 office, was on-site to review the sampling procedures. The results were recently received and they indicate areas of PCB contamination in excess of 500 ppm (wet weight) in impoundment #1. Attached to the Addendum is a copy of the analytical report and a sketch of the impoundments showing sampling locations.

We are re-examining our closure plan in view of these analytical results and would like to review with you our judgments as to how we should proceed. Secure landburial of the impoundment sediments remains the only viable disposal option if we are to complete the construction closure activities this calendar year.

Also, we understand from the list of indicated carbon copies on your July 15 letter that the EPA is involved in the review of this matter. Please advise if the EPA will need to be more formally involved, given the finding of PCB contamination in excess of 500 ppm in Impoundment #1.

By this letter, we also would like to bring the following closure related items to your attention:

1. Groundwater Monitoring Wells. As you know, the closure plan includes a proposed system of groundwater wells to meet "interim status" regulatory requirements. Fisher Guide has held off installing groundwater monitoring wells, given it's understanding that NYDEC wanted to approve the wells in the context of the closure plan. However, in our May 10, 1988 letter, we requested NYDEC approval to proceed with the installation of the wells prior to approval of the closure plan.

Paul R. Counterman
August 26, 1988
Page 3

Given the status of this matter, we believe it is in the best interest of the project to proceed now with the installation of the wells in accordance with the latest draft of the closure plan, as modified by the enclosed addendum. O'Brien & Gere has set the week of September 19, for installing these wells. The NYDEC representative who wishes to oversee the installation should contact John Tomik of O'Brien & Gere to confirm the actual date and time for commencement of this work.

2. SEOR Process. In our letter to you of May 10, 1988, we noted that Fisher Guide will need to obtain two local agency approvals for the closure project. Applications have not yet been finalized as we await NYDEC approval of the final closure plan. Please confirm that NYDEC approval of the closure plan is the only approval/permit required from the Department and that NYDEC will be conducting the environmental review as lead agency.

We will contact your office next week to set up a mutually convenient date and time for the meeting. Your courtesies will be appreciated.

Very truly yours,

FISHER GUIDE DIVISION
General Motors corporation



Richard J. Larkin
Manager
Manufacturing Engineering

cc: Steve Kaminski, P.E. (w/enclosure)
Frank V. Bifera, Esq. (w/enclosure)
G. Michael McPeck (w/enclosure)
Mr. Joseph Barry (w/enclosure)

ADDENDUM

Dated: August, 1988

This sets forth Fisher Guide's response to the Department's Technical Notice of Incompleteness, which was forwarded under cover of Paul Countermand's letter of July 15, 1988.

1.2 PROJECT OBJECTIVES

Comment

Applicant must not only provide an average for PCB concentrations at Meadowbrook, but also the highest and lowest values.

Response

This information is set forth in O'Brien & Gere's September, 1987 Report entitled "Risk Assessment Meadowbrook/ Hookway Ley Creek Sediment Deposit Area." The report has been previously provided to the Department and this was confirmed at Fisher Guide's December 21, 1987 meeting with Paul Countermand and representatives of his staff in Albany. However, as a courtesy, we have attached as Exhibit A two sketches of the Meadowbrook area which gives the sample locations and the reported PCB concentrations.

2.1 WASTE INVENTORY

Comment

The statement that claims all waste will be disposed of at SCA/Chemical Waste Managements landfill cannot be made as

there has been no acceptable characterization of the sludges to date.

Response

In accordance with the discussion at the Albany technical meeting in March of 1988, the sediments from the impoundments were re-characterized. Attached as Exhibit B is a copy of the analytical report and a sketch of the impoundments, showing sampling locations. The testing results showed PCB contamination in excess of 500 ppm (wet weight) in Impoundment #1. Disposal options in light of these results are being evaluated and will be reviewed with NYDEC at a meeting to be held after Labor Day.

Fisher Guide will perform any additional characterization of the sediments which is required by the hazardous waste management facilities involved. Attached as Exhibit C is a copy of a typical waste characterization form which will need to be completed by Fisher Guide for the disposal facilities being considered for handling the PCB wastes at this site.

2.2.1 RUN-ON AND RUN-OFF CONTROL

Comment

Describe the method for minimizing run-on and run-off of the stockpiled Meadowbrook soils.

Response

During impoundment closure operations, Fisher Guide will make every effort to schedule Meadowbrook soil deliveries so

that the soils can be immediately placed into the excavated impoundments upon arrival at the site.

Should stockpiling nevertheless occur, it will be for only a few days at most and a plastic cover with tie-downs will be placed on the pile. Furthermore, the stockpile will be situated directly adjacent to Impoundment #1 and any runoff will be directed into the impoundment by a shallow swale around the pile. Any runoff produced would not be any more hazardous than the Meadowbrook soils to be placed into the impoundment. In this case, the impoundment will serve as an effective catch basin.

2.2.2 DUST AND PARTICULATE CONTROL

Comment

Describe the moisture control measures to be implemented to avoid nuisance dust and airborne particulate matter.

Response

A water supply source will be maintained on site to control nuisance dust. A water hose with a pressure nozzle will be used to sprinkle temporary work areas, Meadowbrook soils during placement and the fill soils.

The impoundment sediments should not be overly dry during closure, but a hose will be used to control particulates, if necessary. Since placement of the Meadowbrook soils will only take a few days, fugitive dust from this phase of the work should be a minor concern. Fill soils will also be moisture-controlled during placement, not only to minimize dust, but also to meet compaction specifications.

2.3.1 OVERVIEW

Comment

This section states that all contaminated materials will be disposed of in a TSCA approved landfill. It should be added that material may need to be incinerated pending characterization of the waste.

Response

See Response to 2.1

2.3.2 REMOVAL/TREATMENT OF SUPERNATANT

Comment

Applicant must describe the manner in which the supernatant will be stored while awaiting the laboratory results to determine if pretreatment is necessary. What are the pretreatment criteria? What is the lab turn around time?

Response

During the July, 1988 recharacterization program, three (3) samples were taken of impoundment supernatant and analyzed for PCBs at a New York-certified laboratory. Two samples were duplicates from Impoundment #1, and the third from the smaller Impoundment #2. An average of 7.05 ug/l of Aroclor 1242 was detected in these samples (4.2/16 ug/l - Impoundment #1 and .95 ug/l - Impoundment #2); Aroclor 1242 was the only PCB detected. The discharge limit for PCBs in Fisher Guide's POTW permit is 2.0 ug/l for total PCBs (Aroclors) as defined by U.S. EPA Method 608.

As part of the closure operations, all supernatant waters will be pretreated in a portable carbon filtration unit to be located next to the impoundments. Supernatant will first be pumped to a settling tank to remove coarse solids. From the tank, the water will go through portable activated carbon columns to remove PCBs. Supernatant will then be directed to portable batch tanks for sampling. These tanks may be one-piece molded units or formed units with a flexible membrane line. When each batch unit is filled, a sample will be taken and analyzed for PCBs at a local laboratory which has been certified by the Department.

Pending favorable results from the laboratory, each batch tank will be pumped to Fisher Guide's on-site wastewater treatment plant ("WWTP") for more treatment prior to discharge to the Onondaga County POTW. The Fisher Guide WWTP also includes a carbon filtration unit. However, the capacity of that system is limited, and the carbon unit may not be available for supernatant and decontamination water treatment at the on-site WWTP during closure operations.

To facilitate continuous treatment of supernatant, at least two batch tanks will be used to store treated water prior to discharge to the on-site WWTP. Samples will be analyzed with a 24-hour turn-around time at a locally certified laboratory.

2.3.4 IMPOUNDMENT STRUCTURES DISMANTLING,
DECONTAMINATION AND/OR DISPOSAL

Comment

Concrete and wood, being porous, are difficult to thoroughly decontaminate. If decontamination is attempted, then surface samples of both the wood and concrete will be required to be sampled. Otherwise they must be disposed of as hazardous waste. Wipe tests should be taken of the metal structures in addition to washwater analyses.

Response

Impacted concrete and wood will not be decontaminated but disposed as hazardous waste. Washwater analysis will be performed to ensure that discharge standards are met.

2.3.5 BACKFILLING, GRADING, AND LANDSCAPING,
IMPOUNDMENT NO. 2

The applicant is required to provide justification for not placing a cap on this unit. Under RCRA, this impoundment will not be considered "clean closed" until the soil levels meet or fall below the health-based standards for all the contaminants of concern. If the applicant encounters groundwater, yet has not met the health-based standard some type of cap might still be considered appropriate unless the applicant can show that the volatilization of any constituents is negligible.

Response

Fisher Guide will perform verification soil sampling and analysis for Impoundment #2. If the clean standards are not

achieved before encountering groundwater, an impermeable cap will be installed. The design and construction of the cap will be similar to that of Impoundment #1.

2.3.6 DESIGN AND CONSTRUCTION OF MEADOWBROOK
PLACEMENT AREA

Comment

This section must state that all modeling data or subsoil characteristics used as a basis for design of the placement area (i.e., cap) must be approved by NYSDEC;

The cap permeability must be less than 10^{-7} cm/sec, not 10^{-6} cm/sec;

The last paragraph should read, ". . . impact of the proposed project and not affect post closure care."

Response

All modeling data used in the Hydrologic Evaluation of Landfill Performance (HELP) model will be provided to NYDEC. This includes climatological data, soil and waste characteristics, and other input values.

The impermeable cap will exhibit a vertical hydraulic conductivity of 10^{-7} cm/sec or less.

With respect to the comment directed to the last paragraph of this section, Fisher Guide generally concurs with the Department and proposes that the referenced sentence in the plan read as follows: ". . . GMC Fisher Guide satisfies the concerns of NYDEC with respect to potential environmental impact of the proposed project, including impacts on post-closure care."

2.4 VERIFICATION SOIL SAMPLING AND ANALYSIS PLAN

Comment

All parameters of interest in this area must be tested for in the soil. In addition to PCBs and chromium, volatiles and metals should be run;

The analyses for the metals should be EP Tox as well as Totals;

As a point of clarification, GMC will be required to sample for Appendix IX constituents beneath the impoundments after all soil verification samples have come back clean. The depth of the Appendix IX samples shall be one foot in depth. This information will be used as part of a database on which to develop a post-closure monitoring network.

Response

In the early drafts of the closure plan, Fisher Guide selected PCBs and chromium as its closure standard parameters based on known waste characteristics and this is the first time NYDEC has commented on the selection of these parameters. They are reasonable indicators of the extent of contamination and NYDEC has not explained why the presence of volatiles and metals should now be evaluated.

The closure plan already states Fisher Guide's willingness to sample for Appendix IX constituents. With respect to the depth of the samples, the plan was previously modified to reflect

NYDEC's January, 1988 comment to increase the depth from 4 to 6 inches. If desired, Fisher Guide is willing to modify the depth a second time to one foot.

2.4.2 LABORATORY ANALYSIS

Comment

A New York State technically acceptable laboratory must be used.

The NYSDEC reserves the right to not accept any data from analyses performed by laboratories that do not meet the NYSDEC "technically acceptable" standards.

Response

A NYDEC technically acceptable laboratory will be used for analysis.

2.7 HEALTH AND SAFETY

Comment

The Site Safety Plan (SSP) must be approved by NYSDEC and in place before any on-site work begins. In the applicant's cover letter, it is stated that portions of the work will begin prior to regulatory approval. Therefore, it is unacceptable for the Site Safety Plan to be prepared by the closure contractor following closure plan approval and prior to closure;

It is assumed that the 3 zones will be fully described in the SSP, as well as the levels of protection to be required at this site;

Describe fully the method for preventing volatilization of the PCBs during closure;

The SSP must present levels to be used in determining when safety monitoring is needed and what steps will be taken if safe levels are exceeded.

Response

No construction activities will take place before approval of the Site Safety Plan. The work items mentioned in the cover letter were preconstruction activities only. No activities have been or will be attempted which would require an in-place construction Site Safety Plan, without approval of the SSP by NYDEC.

The three zones will be delineated in the SSP. Levels of protection required for each zone, and the criteria that will be used to upgrade the level of protection in the work zone will be fully described in the SSP.

Particulate sampling for PCBs will be conducted at the site to provide safety monitoring.

The SSP will define safe levels and the steps to be taken if they are exceeded. Volatilization of the PCBs should not be a problem at this site. PCBs are virtually nonvolatile in the absorbed state. Considering the tendency for PCBs to preferentially partition into the organic phase of soils, little or no volatilization should occur during closure operations.

Particulate sampling will be more relevant to health and safety concerns.

2.10 POST-CLOSURE PLAN

Comment

Amend the second paragraph to state that post-closure care and monitoring shall continue until the post-closure permit is issued.

Response

The plan will confirm that the post-closure care described in the plan will continue until the post-closure permit is issued. However, Fisher Guide expects the post-closure permit will be issued following the completion of the construction closure activities.

Appendix C - PRECONSTRUCTION ACTIVITY

Comment

Sediment samples for recharacterization should also be analyzed for metals and volatiles. If these are not found in the sludge, then it will not be necessary to analyze for them in the soil verification phase;

Under "Evaluation of Construction Materials" it should note that all data compiled to evaluate design suitability must be reviewed and approved by NYSDEC.

Response

As to the first comment, see Response to 2.1. With respect to the second comment, all data used to confirm the

suitability of construction materials will be provided to NYDEC for its review and approval.

Appendix E: POST CLOSURE GROUND WATER MONITORING PLAN

2.01 WELL LOCATIONS

Comment.

The maximum screen length that will be used in a single monitoring well installation must be stated. NYSDEC recommends a screen length of no more than ten feet.

Response.

Section 2.01 of the work plan will be modified to insert the following:

"Monitoring well screen lengths will be selected dependent upon site specific geologic conditions noted at each well location. If the aquifer thickness at a given location is determined to be less than 15 feet, a single monitoring well will be installed and screened with a 10 foot section of stainless steel well screen extending from the ground water interface to the top of the till layer. In areas where the aquifer exceeds 15 feet in thickness, a nested pair of wells will be installed consisting of a shallow well screened at the water table interface and a deeper well screened immediately above the aquifer/till interface. These wells will be fitted with 5 foot sections of stainless steel well screen."

Comment.

Soil samples should also be taken continuously and sampled for PCBs, volatiles and metals.

Response.

Continuous soil samples from the well borings for analysis of PCBs, volatiles and metals were never requested in the Department's comment letters on the two prior drafts of the closure plan. Nor were they requested at the technical meeting held in Albany in March of 1988. Because the wells will be installed outside the impoundments, this sampling does not provide any technical data pertinent to the closure. The work is unnecessary and has no regulatory basis.

2.03 ANALYTICAL REQUIREMENTS

Comment.

The entire scans should be run on the initial round of sampling (semivolatiles, BNAs and metals). Volatiles should be run on all RCRA wells during the accelerated program to rule out their presence.

Response.

DEC has previously requested that the entire scan (which includes acid extractable and base neutral analysis) be performed on all wells. However, previous analyses for priority pollutants at the site does not justify this comprehensive analytical program. As a compromise, it was agreed at the Albany technical meeting

that Appendix IX analyses would be performed on two wells initially with subsequent analysis on all wells limited to those Appendix IX parameters detected in the initial round.

Comment.

The upgradient well is not a compliance point well; it is a well used for comparison purposes to a compliance point well. 6 NYCRR 373-2.6(f) describes the point of compliance more fully.

Response.

Section 2.03 of the work plan will be revised to delete the second last sentence of the paragraph and insert the following: "In addition, during the initial sampling event, one designated upgradient monitoring well and one downgradient compliance monitoring well will be sampled for Appendix IX constituents as identified in 6 NYCRR Part 371."

2.04 MONITORING FREQUENCY

Comment.

The entire RCRA Monitoring well network is to be sampled on the accelerated program, not just the compliance well and the upgradient well. Samples will be analyzed for the site specific parameters listed in Section 2.03, plus volatiles, plus any parameters found in Appendix IX analyses.

Response.

This monitoring frequency/analytical requirement for the accelerated monitoring program is not justified from previous analyses. Fisher Guide understood from previous negotiations that

the proposed sampling set forth in the closure plan of one upgradient and one compliance well for detailed analyses was satisfactory.

Comment.

Following the accelerated 6 month program, all the wells shall be sampled quarterly until the post-closure permit is issued.

Response.

Following the accelerated sampling program, all newly installed RCRA wells will be sampled on a quarterly basis until the post-closure permit is issued. This is in accordance with the current draft of the closure plan.

3.02 SAMPLE PRESERVATION AND SHIPMENT

Comment.

Metals analysis for the RCRA program must be total metals. Fisher [Guide] may analyze total and soluble metals until sufficient data is generated that justifies using soluble metals.

The unfiltered samples to be analyzed for metals must also be preserved to a pH of less than 2 in the field.

Response.

These comments are addressed in Section 3.02 of Appendix E of the current draft of the closure plan. Priority pollutant metals analyses are to be for total metals. All samples filtered and unfiltered collected for metals analyses will be preserved to a pH of less than 2 in the field.

4.01 GROUND WATER ELEVATION ASSESSMENT

Comment.

Groundwater elevations collected during the accelerated monitoring program must also be summarized on a data base table.

Response.

A complete round of ground water elevations will be collected during each sampling event including the accelerated and quarterly sampling events. These data will be reduced to datum and summarized on a data base table. This requirement was implicit in the current draft of the closure plan.

4.02 GROUND WATER QUALITY ASSESSMENT

Comment.

Replicates must be run on all parameters for those wells that will be used for statistical analysis. This includes the downgradient compliance point well and the upgradient wells.

Response.

Section 4.04 of Appendix E clearly states that replicate samples will be collected in the designated upgradient well and downgradient compliance point well. These samples will be analyzed for elevated constituent parameters identified by the Appendix IX analyses.

4.03 REPORT SUBMITTALS

Comment.

Explain why data from the first and third quarters will not be used to prepare the annual report. 6 NYCRR 373.3 requires

that an annual report be submitted by March 1 of the following year, until a Post-Closure permit is issued.

Response.

It was always intended to submit all data collected during the year. The clarification will be made.

MONITORING WELL INSTALLATION PROTOCOL (Post-Closure Groundwater Monitoring - Appendix B)

I. Drilling and Sampling Procedures

Comment.

Describe how the drilling rig and equipment will be decontaminated. Continuous samples shall be taken and analyzed. List what will each sample be analyzed for and the appropriate containers for each.

Response.

It was intended that the drilling and associated equipment which come into contact with potentially contaminated materials will be cleaned on-site with a portable pressurized steam cleaner.

The purpose of the post-closure monitoring program is to assess ground water quality upgradient and downgradient of the surface impoundments, not to define subsurface soil conditions. Consequently, the proposed analyses of soil samples is not acceptable. This comment was never mentioned by NYDEC following review of the earlier drafts of the closure plan or at the Albany technical meeting.

II. Monitoring Well Completion

Comment.

Further details must be provided on the well completion data, such as: length of screen, length of sand pack, protective apron etc. Provide a typical illustration.

Response.

The monitoring well details are described in Section 2.02 and Appendix B of the post-closure groundwater monitoring plan. However, a typical illustration can be provided and a more detailed description can be included such as the following:

Screen lengths for each monitoring well will have a maximum length of 10 feet, sand packs will consist of an appropriate sized, graded aggregate, (preferably Q-Rock-4). The sand pack will extend a minimum of two feet above the top of the well screen. Subsequent to grouting, an outward sloping concrete apron will be installed around the protective casing to insure that runoff will proceed away from the well head.

All monitoring wells will be developed or cleared of all fine grained materials and sediments that have settled in or around the well during installation to insure the screen is transmitting representative portions of the ground water. The development will be by one of three methods, air surging, pumping, or bailing ground water from the well until it yields

relatively sediment-free water. The determination of which method to use is dependent upon the size and depth of well and the volume of ground water in the well.

The air surging method of development consists of extending a clean propylene tube down into the screened portion of the well. This tube is attached to an air compressor. The compressed air displaced the water and suspended fine grained material from the well. The well is allowed to surge until the ground water clears. For either the pumping or bailing method, a decontaminated pump or bailer will be utilized and subsequently decontaminated after each use. Ground water will be pumped from the bottom of the well. Bailing will utilize a stainless steel bailer and new polypropylene rope. Pumping or bailing will cease when the ground water yields sediment-free water.

GROUND WATER SAMPLING PROCEDURES (Post-Closure Groundwater Monitoring - Appendix D)

Comment.

Bottom filling bailers must be used to take samples to avoid aeration of sample.

Total well depth must also be measured at the beginning of each sampling event.

Continue bailing until three volumes have been removed and the pH and specific conductivity have stabilized.

Explain how the purge water will be disposed.

Samples for volatile analysis must be taken no more than three hours after the completion of purging.

Measure the depth to water just prior to sampling to observe the recovery of the well.

Response.

NYDEC's comments regarding sampling were not included in the Department's comments on earlier drafts of the closure plan nor were they raised at the March, 1988 technical meeting in Albany. However, Fisher Guide is willing to address these comments as follows:

Materials

A bottom loading stainless steel bailer will be used to collect ground water samples.

Sampling Procedures Using a Bailer

The total depth of each well will be measured prior to initiating well evacuation.

Bailing will continue until 3 to 5 well volumes have been evacuated and/or pH and specific conductivity measurements exhibit reasonable stability.

Purged water will be containerized and transported to the on-site Waste Water Treatment facility for disposal.

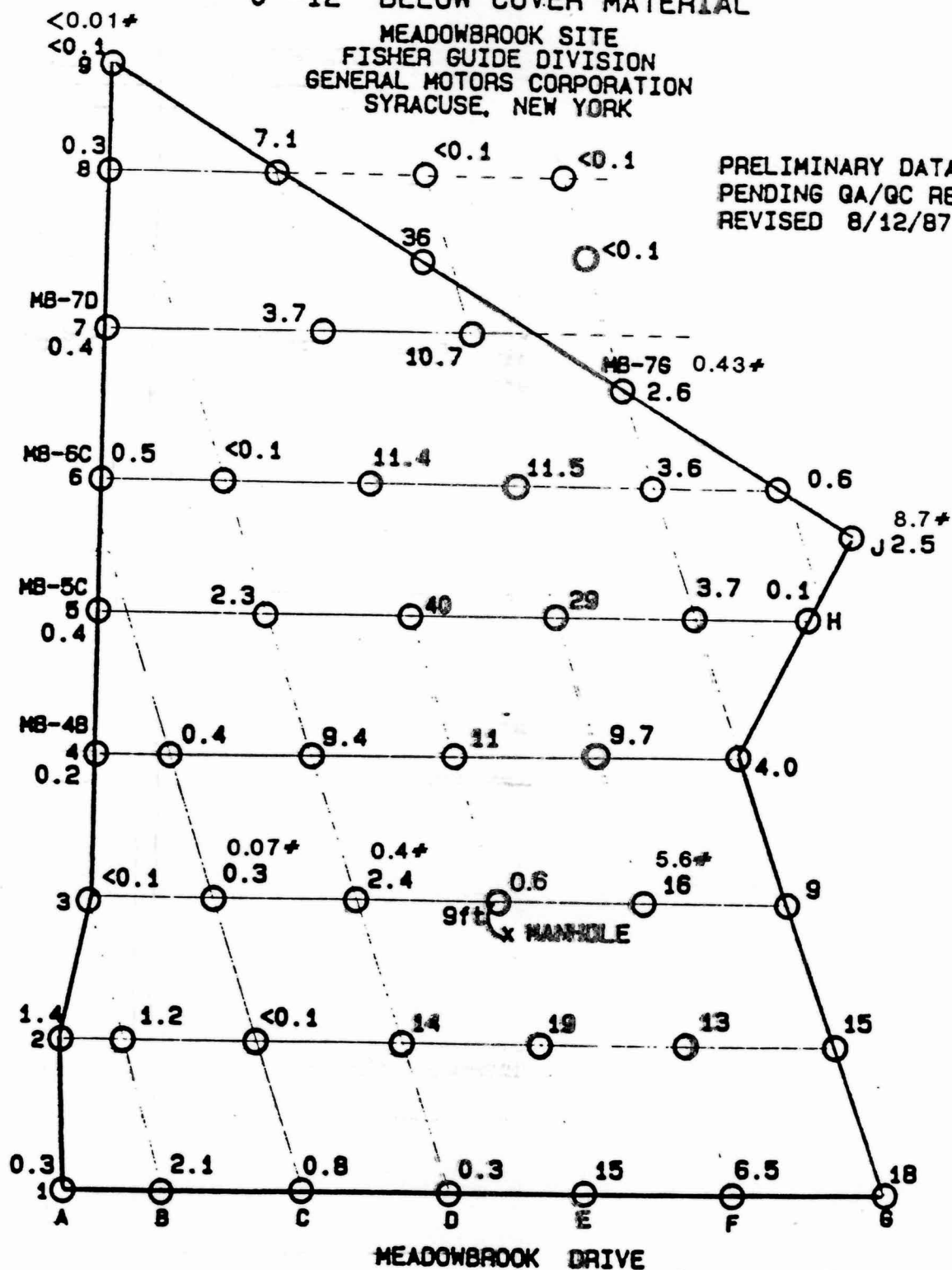
Samples for volatile analysis will be collected within 3 hours of evacuation.

A ground water elevation measurement will be taken prior to sampling each well to observe the percent of recovery.

SOIL SAMPLE ANALYSIS RESULTS 0"-12" BELOW COVER MATERIAL

MEADOWBROOK SITE
FISHER GUIDE DIVISION
GENERAL MOTORS CORPORATION
SYRACUSE, NEW YORK

PRELIMINARY DATA
PENDING QA/QC REVIEW
REVISED 8/12/87



LEGEND

PCB CONCENTRATION IN ppm
(MG/KG DRY WEIGHT)

* DEC Results

0 25 50
SCALE IN FEET



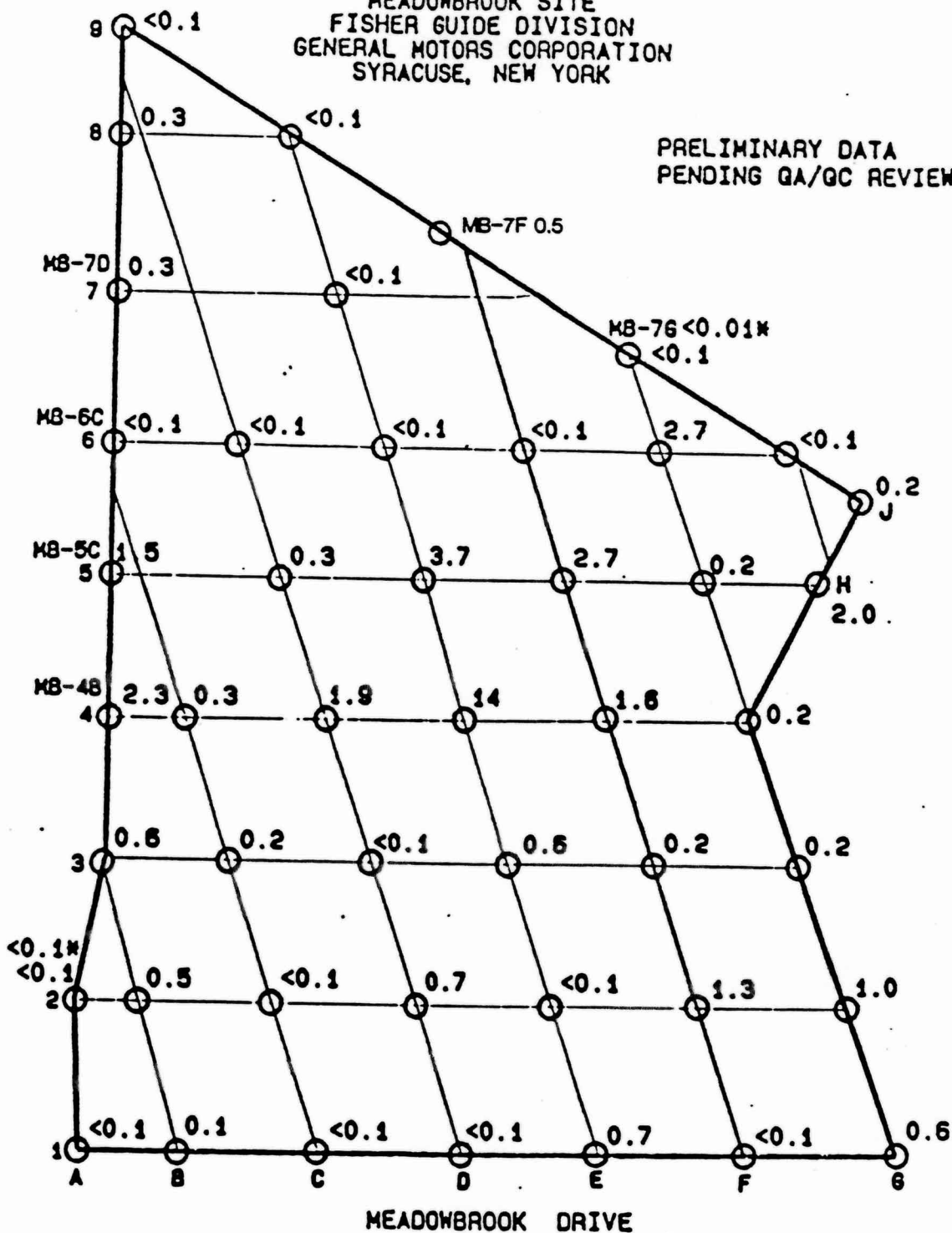
O'BRIEN & GERE
ENGINEERS, INC.

FIGURE 3

SOIL SAMPLE ANALYSIS RESULTS 12"-18" BELOW FILL MATERIAL

MEADOWBROOK SITE
FISHER GUIDE DIVISION
GENERAL MOTORS CORPORATION
SYRACUSE, NEW YORK

PRELIMINARY DATA
PENDING QA/QC REVIEW



LEGEND

PCB CONCENTRATION IN ppm
(MG/KG DRY WEIGHT)

* DEC RESULTS



G O'BRIEN GERE

Inter-Office Memorandum



TO: Tom Carlisle

cc: John Mooney

FROM: Sharon Nordstrom *SN* DATE: 22 July, 1988
PROJECT: GMC - Fisher Guide W.O. NO.: 1138-41-01
SUBJECT: PCB Data Report

ACTION:

Attached is our data report for the water and sediment samples submitted for analysis on 7-7-88. Please note that the sediment samples are reported on a dry weight basis. If you should have any questions regarding our report, please give me a call.

RECEIVED

JUL 25 1988

ROY F. WESTON, INC.
CHICAGO OFFICE

WESTON ANALYTICS
PCB ANALYTICAL DATA PACKAGE FOR
GMC-FISHER GUIDE

DATE RECEIVED: 07/07/88

RFW LOT # :8807-920

CLIENT ID	RFW #	MTX	PREP #	COLLECTION	EXTR/PREP	ANALYSIS
GM-PW1-01D LAGOON WA	001	W	88E744	07/06/88	07/08/88	07/12/88
GM-FB-01	002	W	88E744	07/06/88	07/08/88	07/12/88
GM-PW1-01	003	W	88E744	07/06/88	07/08/88	07/13/88
GM-PW2-01	004	W	88E744	07/06/88	07/08/88	07/12/88
GM-FILTRATE	005	W	88E744	07/06/88	07/08/88	07/13/88
GM-P1-5A	006	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-7B	007	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-7B	007 MS	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-7B	007 MSD	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-5B	008	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-5B DUP	009	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-6A	010	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P2-2AB	011	SE	88E745	07/06/88	07/08/88	07/13/88
GM-P2-3A	012	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P2-3A	012 REP	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P1-3A	013	SE	88E745	07/06/88	07/08/88	07/14/88
GM-P2-1B	014	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P2-3B	015	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P2-2A	016	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-2A	017	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-9A	018	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-6C	019	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-10A	020	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-9C	021	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-5C	022	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-7C	023	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-8A	024	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-8C	025	SE	88E745	07/06/88	07/08/88	07/15/88
GM-P1-9B	026	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-10C	027	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-8B	028	SE	88E746	07/06/88	07/08/88	07/14/88
GM-P1-4C	029	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-4C	029 REP	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-4A	030	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-3B	031	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-3B	031 MS	SE	88E746	07/06/88	07/08/88	07/15/88
GM-P1-3B	031 MSD	SE	88E746	07/06/88	07/08/88	07/15/88

LAB QC:

PBLK	MB1	W	88E744	N/A	07/08/88	07/13/88
PBLK	MB1 BS	W	88E744	N/A	07/08/88	07/13/88
PBLK	MB1 BSD	W	88E744	N/A	07/08/88	07/13/88

WESTON ANALYTICS
PCB ANALYTICAL DATA PACKAGE FOR
GMC-FISHER GUIDE

DATE RECEIVED: 07/07/88

RFW LOT # :8807-920

CLIENT ID	RFW #	MTX	PREP #	COLLECTION	EXTR/PREP	ANALYSIS
PBLK	MB1	S	88E745	N/A	07/08/88	07/15/88
PBLK	MB1 BS	S	88E745	N/A	07/08/88	07/15/88
PBLK	MB1	S	88E746	N/A	07/08/88	07/15/88
PBLK	MB1 BS	S	88E746	N/A	07/08/88	07/15/88



Custody Transfer Record/Lab Work Request

Received By P. Heger
Date 7-7-88
Assigned to _____

Client GMC-Fisher Guide
Client Contact William Kocher
Phone 315-432-5314

RFW Contact Bill Dinnigan
Date Due 7-21-88
Project Number 1138-41-01

SAMPLE IDENTIFICATION

ANALYSES REQUESTED

Sample No.	Client ID No.	Description	Matrix	Date Collected	Container/Preservative														
7	GM-PI-2A	GMC/FG PCB Pond Sediment	Soil	7-6-88	Glass Jar/Cool	PCBs													
8	GM-PI-9A	GMC/FG Pond Sediment	S	7-6-88	" "	"													
9	GM-PI-6C	"	S	7-6-88	" "	"													
10	GM-PI-DA	"	S	7-6-88	" "	"													
11	GM-PI-9C	"	S	7-6-88	" "	"													
12	GM-PI-5C	"	S	7-6-88	" "	"													
13	GM-PI-7C	"	S	7-6-88	" "	"													
14	GM-PI-8A	"	S	7-6-88	" "	"													
15	GM-PI-8C	"	S	7-6-88	" "	"													
16	GM-PI-9B	"	S	7-6-88	" "	"													
17	GM-PI-6C	GMC/FG Pond Sediment	S	7-6-88	Glass Jar/Cool	PCBs													
18	GM-PI-8B	"	S	7-6-88	" "	"													
19	GM-PI-4C	"	S	7-6-88	" "	"													
20	GM-PI-4A	"	S	7-6-88	" "	"													
21	GM-PI-3B	GMC/FG Pond Sediment	S	7-6-88	Glass Jar/Cool	PCBs													

Matrix:

S- Soil DS- Drum Solids
W- Water DL- Drum Liquids
O- Oil X- Other

Special Instructions:

Items/Reason	Relinquished By	Received By	Date	Time	Items/Reason	Relinquished By	Received By	Date	Time
15 PCB Analysis	John Mooney	P. Heger	7/6/88	7:00 pm					
	John Mooney	P. Heger	7/7/88	9:30 am					

WESTON Analytics - Dedicated Lab

CLIENT: GMC-FISHER GUIDE
RFW # : 8807-920
W.O.# : 1138-41-01-0000

DATA QUALIFIER

1. The following qualifiers are used on the data summary:

U - Indicates that the compound was analyzed for but not detected. The minimum detection limit for the sample (not the method detection limit) is reported with the U (e.g., 10U).

J - Indicates an estimated value. This flag is used in cases where a target analyte is detected at a level less than the lower quantification level. If the limit of quantification is 10 ug/L and a concentration of 3 ug/L is calculated, it is reported as 3J.

BS - Indicates blank spike in which reagent grade water is spiked with the CLP matrix spiking solutions and carried through all the steps in the method. Spike recoveries are reported.

BSD - Indicates blank spike duplicate.

MS - Indicates matrix spike.

MSD - Indicates matrix spike duplicate.

DL - Indicates that surrogate recoveries were not obtained because the extract had to be diluted for analysis.

NA - Not applicable.

DF - Dilution factor.

NR - Not required.

I - Interference.


P. Michael Taylor
Project Director
Lionville Analytical Laboratory

7-21-88
DATE

WESTON ANALYTICS
PCBs by GC

Report Date: 07/20/88 14:07

RFW Batch Number: 8807-920

Client: GMC FISHER GUIDE

Work Order: 1138-41-01-0000

Page: 1

	Cust ID:	GM-PW1-01D L AGOON WA	GM-FB-01	GM-PW1-01	GM-PW2-01	GM-FILTRATE	GM-P1-5A
Sample Information	RFW#:	001	002	003	004	005	006
	Matrix:	WATER	WATER	WATER	WATER	WATER	SEDIMENT
	D.F.:	1.00	1.00	10.0	1.00	10.0	1000
	Units:	UG/L	UG/L	UG/L	UG/L	UG/L	UG/KG
=====f -----f -----f -----f -----f -----f =====f							
Analyte:							
Aroclor-1016		0.50 U	0.50 U	5.0 U	0.50 U	5.3 U	640000 U
Aroclor-1221		0.50 U	0.50 U	5.0 U	0.50 U	5.3 U	640000 U
Aroclor-1232		0.50 U	0.50 U	5.0 U	0.50 U	5.3 U	640000 U
Aroclor-1242		4.2	0.50 U	16	0.95	15	2700000
Aroclor-1248		0.50 U	0.50 U	5.0 U	0.50 U	5.3 U	640000 U
Aroclor-1254		1.0 U	1.0 U	10 U	1.0 U	11 U	1300000 U
Aroclor-1260		1.0 U	1.0 U	10 U	1.0 U	11 U	1300000 U

	Cust ID:	GM-P1-7B	GM-P1-7B	GM-P1-7B	GM-P1-5B	GM-P1-5B DUP	GM-P1-6A
Sample Information	RFW#:	007	007 MS	007 MSD	008	009	010
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	2000	2000	2000	2000	2000	2000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
=====f -----f -----f -----f -----f -----f =====f							
Analyte:							
Aroclor-1016		1400000 U	1400000 U	1300000 U	1900000 U	1500000 U	2000000 U
Aroclor-1221		1400000 U	1400000 U	1300000 U	1900000 U	1500000 U	2000000 U
Aroclor-1232		1400000 U	1400000 U	1300000 U	1900000 U	1500000 U	2000000 U
Aroclor-1242		2600000	2500000	2400000	3900000	3300000	6600000
Aroclor-1248		1400000 U	1400000 U	1300000 U	1900000 U	1500000 U	2000000 U
Aroclor-1254		2700000 U	DL %	DL %	3800000 U	3000000 U	4100000 U
Aroclor-1260		2700000 U	2900000 U	2700000 U	3800000 U	3000000 U	4100000 U

U= Analyzed, not detected. J= Present below detection limit. B= Present in blank. NR= Not requested.
%= Percent recovery. NS= Not spiked. DL= Diluted out. I= Interference. NA= Not Applicable.

WESTON ANALYTICS
PCBs by GC

Report Date: 07/20/88 14:07

RFW Batch Number: 8807-920

Client: GMC FISHER GUIDE

Work Order: 1138-41-01-0000

Page: 2

	Cust ID:	GM-P2-2AB	GM-P2-3A	GM-P2-3A	GM-P1-3A	GM-P2-1B	GM-P2-3B
Sample Information	RFW#:	011	012	012 REP	013	014	015
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	100	1000	1000	1000	100	1000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
=====f)=====f)=====f)=====f)=====f)=====f)=====							
Analyte:							
Aroclor-1016		39000 U	420000 U	410000 U	1100000 U	40000 U	390000 U
Aroclor-1221		39000 U	420000 U	410000 U	1100000 U	40000 U	390000 U
Aroclor-1232		39000 U	420000 U	410000 U	1100000 U	40000 U	390000 U
Aroclor-1242		610000	450000	500000	2100000	35000 J	230000 J
Aroclor-1248		39000 U	420000 U	410000 U	1100000 U	40000 U	390000 U
Aroclor-1254		77000 U	840000 U	820000 U	2300000 U	80000 U	780000 U
Aroclor-1260		77000 U	840000 U	820000 U	2300000 U	80000 U	780000 U

	Cust ID:	GM-P2-2A	GM-P1-2A	GM-P1-9A	GM-P1-6C	GM-P1-10A	GM-P1-9C
Sample Information	RFW#:	016	017	018	019	020	021
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	500	2000	500	1000	500	2000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
=====f)=====f)=====f)=====f)=====f)=====f)=====							
Analyte:							
Aroclor-1016		260000 U	1100000 U	1000000 U	710000 U	210000 U	1800000 U
Aroclor-1221		260000 U	1100000 U	1000000 U	710000 U	210000 U	1800000 U
Aroclor-1232		260000 U	1100000 U	1000000 U	710000 U	210000 U	1800000 U
Aroclor-1242		250000 J	5200000	1000000	2100000	220000	6400000
Aroclor-1248		260000 U	1100000 U	1000000 U	710000 U	210000 U	1800000 U
Aroclor-1254		510000 U	2300000 U	2000000 U	1400000 U	420000 U	3700000 U
Aroclor-1260		510000 U	2300000 U	2000000 U	1400000 U	420000 U	3700000 U

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WESTON ANALYTICS
PCBs by GC

Report Date: 07/20/88 14:07

RFW Batch Number: 8807-920

Client: GMC FISHER GUIDE

Work Order: 1138-41-01-0000

Page: 3

	Cust ID:	GM-P1-5C	GM-P1-7C	GM-P1-8A	GM-P1-8C	GM-P1-9B	GM-P1-10C
Sample Information	RFW#:	022	023	024	025	026	027
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	1000	1000	1000	1000	2000	1000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
=====f -----f -----f -----f -----f -----f =====							
Analyte:							
Aroclor-1016		700000 U	1200000 U	1300000 U	810000 U	1300000 U	520000 U
Aroclor-1221		700000 U	1200000 U	1300000 U	810000 U	1300000 U	520000 U
Aroclor-1232		700000 U	1200000 U	1300000 U	810000 U	1300000 U	520000 U
Aroclor-1242		3100000	2200000	3000000	5100000	3300000	960000
Aroclor-1248		700000 U	1200000 U	1300000 U	810000 U	1300000 U	520000 U
Aroclor-1254		1400000 U	2500000 U	2500000 U	1600000 U	2700000 U	1000000 U
Aroclor-1260		1400000 U	2500000 U	2500000 U	1600000 U	2700000 U	1000000 U

	Cust ID:	GM-P1-8B	GM-P1-4C	GM-P1-4C	GM-P1-4A	GM-P1-3B	GM-P1-3B
Sample Information	RFW#:	028	029	029 REP	030	031	031 MS
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	100	100	100	2000	2000	2000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
=====f -----f -----f -----f -----f -----f =====							
Analyte:							
Aroclor-1016		150000 U	110000 U	110000 U	840000 U	1000000 U	1000000 U
Aroclor-1221		150000 U	110000 U	110000 U	840000 U	1000000 U	1000000 U
Aroclor-1232		150000 U	110000 U	110000 U	840000 U	1000000 U	1000000 U
Aroclor-1242		2400000	520000	410000	2700000	4900000	6000000
Aroclor-1248		150000 U	110000 U	110000 U	840000 U	1000000 U	1000000 U
Aroclor-1254		290000 U	210000 U	220000 U	1700000 U	2000000 U	DL %
Aroclor-1260		290000 U	210000 U	220000 U	1700000 U	2000000 U	2100000 U

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WESTON ANALYTICS
PCBs by GC

Report Date: 07/20/88 14:07

RFW Batch Number: 8807-920

Client: GMC FISHER GUIDE

Work Order: 1138-41-01-0000

Page: 4

	Cust ID:	GM-P1-3B	PBLK	PBLK BS	PBLK BSD	PBLK	PBLK BS
Sample Information	RFW#:	031 MSD	88E744-MB1	88E744-MB1	88E744-MB1	88E745-MB1	88E745-MB1
	Matrix:	SEDIMENT	WATER	WATER	WATER	SOIL	SOIL
	D.F.:	2000	1.00	1.00	1.00	0.500	5.00
	Units:	UG/KG	UG/L	UG/L	UG/L	UG/KG	UG/KG
=====f =====f =====f =====f =====f =====f =====f =====f =====							
Analyte:							
Aroclor-1016		1100000 U	0.50 U	0.50 U	0.50 U	120 U	1200 U
Aroclor-1221		1100000 U	0.50 U	0.50 U	0.50 U	120 U	1200 U
Aroclor-1232		1100000 U	0.50 U	0.50 U	0.50 U	120 U	1200 U
Aroclor-1242		2900000	0.50 U	0.50 U	0.50 U	110 J	1200 U
Aroclor-1248		1100000 U	0.50 U	0.50 U	0.50 U	120 U	1200 U
Aroclor-1254		DL %	1.0 U	115 %	117 %	240 U	113 %
Aroclor-1260		2100000 U	1.0 U	1.0 U	1.0 U	240 U	2400 U

	Cust ID:	PBLK	PBLK BS
Sample Information	RFW#:	88E746-MB1	88E746-MB1
	Matrix:	SOIL	SOIL
	D.F.:	0.500	0.500
	Units:	UG/KG	UG/KG
=====f =====f =====f =====f =====f =====f =====f =====f =====			
Analyte:			
Aroclor-1016		120 U	120 U
Aroclor-1221		120 U	120 U
Aroclor-1232		120 U	120 U
Aroclor-1242		31 J	120 U
Aroclor-1248		120 U	120 U
Aroclor-1254		240 U	126 %
Aroclor-1260		240 U	240 U

U= Analyzed, not detected. J= Present below detection limit. B= Present in blank. NR= Not requested.
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SAMPLE EXTRACTION RECORD

Sheet No: 1

tract. Date: 87/08/88

Extraction Batch No: 88E744

Analyst: MAM

Method: LIG-LIQ

Test: JPCB

Cleanup Date:

Analyst: EAL

Client: SMC FISHER

Solvent: DCM/HEX

Absorbent: H2SO4

Sample No:	Client ID	pH	Initial NT/VOL	Surv. Mult.	Spine Mult.	Final VOL	Final VOL N/A	Spill Mult.	% Solids	C/D FACTOR
928-										
801		7.00	1000	1		10		1.00		10.00
802		7.00	1000	1		10		1.00		10.00
803		7.00	1000	1		10		1.00		10.00
804		7.00	1000	1		10		1.00		10.00
805		7.00	950	1		10		1.00		10.00
744-MS:		7.00	1005	1		10		1.00		10.00
744-MS:	3	7.00	1005	1	1	10		1.00		10.00
744-MS:	7	7.00	1005	1	1	10		1.00		10.00

Comments:

Progate: 100 UL 880-45 5.199 US/UL

1KE: 12 UL 880-45 1254 0.3 US/UL

Tracts Transferred: , Pelliculated By: , Date Time: , Received By: , Date Time: , Reason for Transfer:

SAMPLE EXTRACTION RECORD

Sheet No: 1

Inact. Date: 87/06/08

Extraction Batch No: 88E745

Analyst: MM

Method: SOXHLET

Test: OPCS

Cleanup Date:

Analyst: EAL

Client: GNC FISHER

Solvent: HEX/ACETONE

Adsorbent: H2504

Sample No:	Client ID	pH	Initial WT VOL	Surr. Mult.	Spike Mult.	Final VOL	Final VOL N/A	Split Mult.	% Solids	C/D FACTOR
-928-										
806		9.8		1		10			38.00	2685.264
807		10.7		1		10			33.00	2832.858
807 S		10.1		1	10	10			33.00	3000.302
807 T		10.0		1	10	10			33.00	2788.894
808		10		1		10			25.00	4000
809		10.1		1		10			28.00	3132.832
810		10.2		1		10			28.00	4237.386
811 - 2		10.1		1		10			61.00	1607.200
812 - 2		9.7		1		10			59.00	1747.333
812 P - 2		9.9		1		10			59.00	1712.035
813		10.0		1		10			28.00	4716.981
814 - 2		10.7		1		10			56.00	1668.891
815 - 2		10.4		1		10			59.00	1629.726
816 - 2		10		1		10			47.00	2127.659
817		10.1		1		10			42.00	2357.378
818		10		1		10			12.00	8333.333
819		10.0		1		10			32.00	2948.113
820		10.5		1		10			46.00	1739.138
821		10.9		1		10			24.00	3822.620
822		10.7		1		10			32.00	1928.568
823		10.2		1		10			18.00	5144.832
824		10.1		1		10			19.00	5211.047
825		10		1		10			27.00	3367.003
15-M81		10		1		10			100.00	1000
15-M81		10		1	10	10			100.00	1000

Notes: 1.0 ML ACID CLEANED AND GIVEN TO ANALYST
 100 UL DBI-453 4.289 UG/UL
 100 UL PROCHLOR 1254 3.303 UG/UL

Transferred By	Relinquished By	Date Time	Received By	Date Time	Reason for Transfer

SAMPLE EXTRACTION RECORD

Sheet No: 1

Act. Date: 07/09/83 Extraction Batch No: 95E746 Analyst: KAY Method: SOXHLET
 Test: OPCS Cleanup Date: Analyst: EA Client: GMC FISHER
 Solvent: HEXACETONE Absorbent: MCS04

File No:	Client	pH	Initial WT VOL	Surf. Mult.	Spike Final Mult. VOL	Final VOL	Split Mult.	% Solids	D/D FACTOR
						N/A			

806			11.7	1	10			31.28	2765.486
807			12.2	1	10			36.28	3178.138
808			13.2	1	10			16.88	6127.458
809			18.7	1	10			21.32	1456.178
810			18.2	1	10			21.83	4492.362
811			12.2	1	10			46.88	1753.158
812			12.2	1	10			42.08	2171.338
813			12.2	1	10			46.88	2152.388
814			9.7	1	10			46.09	2195.271
746-MB:			12	1	10			189.23	1892
746-MB1			12	1	10			190.23	1902

Comments: 1.0 ML ACID CLEANED AND GIVEN TO ANALYST
 Urrogate: 100 UL 100-455 @ 1.289 LB/UL
 Spike: 100 UL 2500-107 1004 @ 3.323 LB/UL

Extracts Transferred	Relinquished By	Date Time	Received By	Date Time	Reason for Transfer

GMC FISHER GUIDE DIVISION

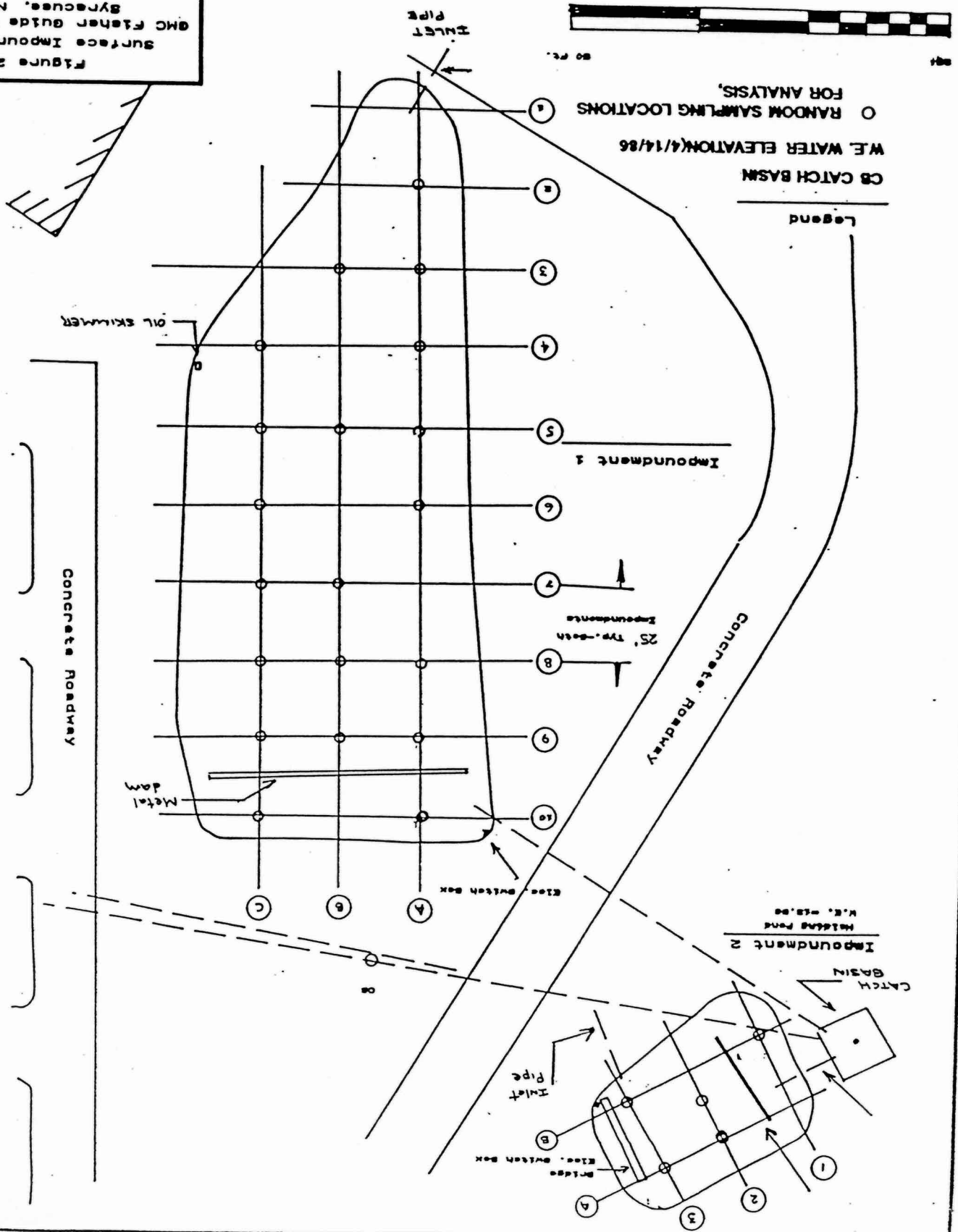
PCB DATA SUMMARY

<u>Client ID</u>	<u>RFW No.</u>	<u>Matrix</u>	<u>Aroclor 1242 mg/kg, dry wt.</u>	<u>Aroclor 1242 mg/kg, wet wt.¹</u>
GM-FW1-01D	001	Water	—	
GM-FB-01	002	Water	—	0.0042
GM-FW1-01	003	Water	—	ND
GM-FW2-01	004	Water	—	0.016
GM-Filtrate	005	Water	—	0.00095
				0.014
GM-P1-5A	006	Sedim	2,700	1,026
GM-P1-7B	007	Sedim	2,600	858
GM-P1-5B	008	Sedim	3,900	975
GM-P1-5BD	009	Sedim	3,300	924
GM-P1-6A	010	Sedim	6,600	1,320
GM-P2-2AB	011	Sedim	610	372
GM-P2-3A	012	Sedim	450	266
GM-P2-3A	012 REP	Sedim	500	295
GM-P1-3A	013	Sedim	2,100	420
GM-P2-1B	014	Sedim	35	19.6
GM-P2-3B	015	Sedim	230	136
GM-P2-2A	016	Sedim	250	118
GM-P1-2A	017	Sedim	5,200	2,184
GM-P1-9A	018	Sedim	1,000	120
GM-P1-6C	019	Sedim	2,100	672
GM-P1-10A	020	Sedim	220	101
GM-P1-9C	021	Sedim	6,400	1,536
GM-P1-5C	022	Sedim	3,100	992
GM-P1-7C	023	Sedim	2,200	396
GM-P1-8A	024	Sedim	3,000	570
GM-P1-8C	025	Sedim	5,100	1,377
GM-P1-9B	026	Sedim	3,300	1,056
GM-P1-10C	027	Sedim	960	346
GM-P1-8B	028	Sedim	2,400	384
GM-P1-4C	029	Sedim	520	109
GM-P1-4C	029 REP	Sedim	410	86
GM-P1-4A	030	Sedim	2,700	1,242
GM-P1-3B	031	Sedim	4,900	2,205

¹ PCB concentrations were reported on a dry weight basis. To convert to mg/kg wet weight:
 (% solids in sample) x (dry weight concentration)
 = wet weight concentration.

Example: for Sample 006,
 (.38) x (2,700 mg/kg) = 1,026 mg/kg.

Figure 2
 Surface Impoundments
 OMC Fisher Guide Division
 Syracuse, NY





Chemical Waste Management, Inc.

GENERATOR'S WASTE MATERIAL PROFILE SHEET WORKSET



Return this completed workset to:

GENERAL INSTRUCTIONS

This workset contains two forms:

- GENERATOR'S WASTE MATERIAL PROFILE SHEET
- GENERATOR'S CERTIFICATION OF REPRESENTATIVE SAMPLE

1. The Generator's Waste Material Profile Sheet is a two-sided form. Both sides must be completed.
2. This document is perforated so the forms and instructions may be separated for your convenience. If the forms are separated, take special precautions to assure that they are used to describe and identify **ONLY** the same waste.
3. Shaded areas on the forms are for Chemical Waste Management use only.
4. Answers must be made to all questions with the exception of PART I, "Reclamation, Fuels or Incineration Parameters," which is optional.
5. Answers must be printed in ink or typed (elite, 12-pitch).
6. Instructions are included to help you complete these forms correctly. The letters and numbers which precede each instruction refer to the lettered and numbered entries on the forms.
7. Both the Generator's Waste Material Profile Sheet and the Generator's Certification of Representative Sample forms must be signed.
8. The Certification of Representative Sample and its peel off Sample Label must be used to identify **ONLY** the sample of the waste described on the attached Generator's Waste Material Profile Sheet.
9. The peel off label must be completed before removal from the form and applied to the container which actually holds the sample material - **not** on the shipping carton - even if the sample already has another label.
10. If you have any questions concerning the use of these forms, please contact your Chemical Waste Management Sales Representative or the office that issued this workset to you.
11. **MAKE A COPY OF THESE FORMS FOR YOUR RECORDS. SEND THE ORIGINALS AND ALL ATTACHMENTS TO THE ADDRESS SHOWN ABOVE OR TO THE ADDRESS PROVIDED BY YOUR CHEMICAL WASTE MANAGEMENT, INC. SALES REPRESENTATIVE.**



Chemical Waste Management, Inc.

GENERATOR'S WASTE MATERIAL PROFILE SHEET



This information is required for a waste to be considered for transportation, treatment, storage or disposal. It is used to determine if the waste may be transported, treated, stored or disposed in a legal, safe, and environmentally sound manner. This information will be maintained in strict confidence. **ANSWERS MUST BE MADE TO ALL QUESTIONS** and must be printed in ink or typed (elite, 12-pitch). A response of "NONE," or "NA" can be made if appropriate.

Shaded areas are for CWM use only.

PART A. GENERAL INFORMATION

1. GENERATOR NAME - Enter the name of the generating facility.
2. GENERATOR USEPA ID - Enter the twelve character alpha-numeric descriptor issued by the USEPA to the facility generating the waste.
3. FACILITY ADDRESS - Enter the street address (not P.O. Box) of the generating facility.
4. GENERATOR STATE ID - Enter the descriptor issued by the state to the facility generating the waste (if applicable).
5. ZIP CODE - Enter the generating facility's five or nine digit zip code.
6. TECHNICAL CONTACT - Enter the name of a person who will answer technical questions about the waste.
7. TITLE - Enter technical contact's title.
8. PHONE - Enter technical contact's telephone number.

PART B. MAIL CHEMICAL WASTE MANAGEMENT INC. INVOICES TO:

1. If you want the invoice mailed to the same address as in PART A, check "Generating Facility." If you want the invoices mailed elsewhere, then indicate the name, phone, and address, as shown in numbers 2 through 5.
2. COMPANY NAME - Enter the name of the company to which you want the invoices sent.
3. PHONE - Enter the telephone number of the company to which you want the invoices sent.
4. ADDRESS - Enter the address of the company to which you want the invoices sent.
5. ZIP CODE - Enter the five or nine digit zip code of the company to which you want the invoices sent.

PART C.

1. NAME OF WASTE - Enter a name that is generally descriptive of this waste (e.g., cyanide plating waste, paint sludge, PCB contaminated dirt, still bottoms, wastewater treatment sludge).
2. PROCESS GENERATING WASTE - List the specific process/operation or source that generates the waste (e.g., metal plating operation, paint spray booth, PCB spill, solvent recovery, wastewater treatment plant).
3. DIOXIN WASTE - Treatment, storage or disposal of Dioxin wastes requires special attention. If this waste is a USEPA listed Dioxin waste, indicate "YES" and contact your Chemical Waste Management Sales Representative. If "YES", **DO NOT COMPLETE THE REMAINDER OF THIS FORM.**

PART D. PHYSICAL CHARACTERISTICS OF WASTE

1. COLOR - Describe the color of the waste (e.g., blue, clear, varies).
2. ODOR - **DO NOT SMELL THE WASTE!** If the waste has a known incidental odor, then describe it (e.g., acrid, pungent, solvent, sweet).
3. PHYSICAL STATE - If the four boxes provided do not apply, a descriptive phrase may be entered after "Other" (e.g., gas).
4. LAYERS - Check all applicable boxes. Multi-layered means more than two layers (e.g., oil/water/sludge). Bi-layered means the waste is comprised of two layers which may or may not be of the same phase (e.g., oil/water, solvent/sludge). Single phased means the waste is homogeneous.
5. SPECIFIC GRAVITY - Indicate the range. The specific gravity of water is 1.0. Most organics are less than 1.0. Chlorinated solvents, most inorganics and paint sludge are greater than 1.0.
6. FREE LIQUIDS - Check "YES" if liquid is usually present when packaging for shipment and estimate the percent of liquid volume. Check "NO" if there are no free liquids as defined by the Paint Filter Test (SW 846 Method 9095).
7. pH - Indicate for liquid or liquid portions of the waste. Check the appropriate boxes which cover the pH of the waste. Use the "Range" space if appropriate. For solid or organic liquid wastes, indicate the pH of a 10% aqueous solution of the waste if applicable. Check "NA" for non-water soluble materials (e.g., bricks, dismantled tanks, empty drums, gases, rocks).
8. LIQUID FLASH POINT - Indicate the liquid flash point obtained using the appropriate testing method (40CFR261.21). The liquid flash point is important from a transportation standpoint (49CFR173.115). Solids with flammable potential should be identified in PART G.3 (e.g., Pyrophoric, RCRA Reactive, Other).

PART E. CHEMICAL COMPOSITION

1. List all organic and/or inorganic components of the waste using **specific chemical names**. If trade names are used, attach Material Safety Data Sheets or other documents which adequately describe the composition of the waste. For each component, estimate the range (in percents) in which the component is present. In case of extreme pH (2 or less or 12.5 or greater) indicate specific acid or caustic species present. This list must include any hazardous components listed in PARTS F, G, and/or H which exceed 10,000 ppm (1%). The total of the maximum values of the components must be greater than or equal to 100% including water, earth, etc.
2. If this waste contains PCBs, cyanides, phenolics or sulfides, indicate the concentration(s). If this waste does not contain these constituents, indicate by checking the "NONE" box(es) which apply. If the concentration of these constituents is unknown, please indicate "UNK" under "ACTUAL."

PART F. METALS

Indicate whether metals content was determined by EP Tox (extraction procedure toxicity)/TCLP (Toxicity Characteristics Leaching Procedure) from 40CFR261-Appendix II or represents the total metals. For each metal, check only one box indicating that the metal content will not exceed the stated amount or enter the actual metal content indicated by your test results in the "ACTUAL" column in parts per million. If you know a metal is **NOT** present, indicate by writing "NA" under "ACTUAL." An actual concentration of zero is not appropriate. If metal concentrations are unknown, please indicate "UNK" under "ACTUAL."

PART G. OTHER HAZARDOUS CHARACTERISTICS

1. Indicate by checking the appropriate box.
2. Indicate by checking the appropriate box. If "YES," indicate the concentration in PART E.
3. Indicate if this waste is any of the following:
RCRA REACTIVE - As defined by 40CFR261.
WATER REACTIVE - Reacts violently with water to form toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment.



Chemical Waste Management, Inc.



EXPLOSIVE - Capable of detonation or explosive reaction if subjected to a strong initiating source or if heated under confinement, a Class A explosive (49CFR173.53), or a Class B explosive (49CFR173.88).

SHOCK SENSITIVE - Normally unstable and readily undergoes violent change without detonating.

PYROPHORIC - Will ignite spontaneously in air at or below 130°F (54.4°C) (49CFR173.115).

RADIOACTIVE - Any material, or combination of materials, that has a specific activity greater than 0.002 microcuries per gram (49CFR173.403).

ETIOLOGICAL - A viable microorganism or its toxin which causes or may cause human disease (49CFR173.386).

PESTICIDE MANUFACTURING WASTE - Waste resulting from the manufacture of pesticides or the potential precursors of pesticides.

OTHER - Indications of other hazardous characteristics must be included (e.g., autopolymerization, peroxide-forming).

NONE OF THE ABOVE - Check this box if it is applicable for this waste.

PART H

Complete **ONLY** for wastes intended for fuels or incineration. If present, indicate the concentration as appropriate. If the concentrations of these constituents are unknown, please indicate "UNK" under "ACTUAL."

The following section lists parameters and suggested analytical methods that may be used in obtaining these values:

Parameter	Source
Beryllium, Potassium, Sodium	SW846-6010, 7090, 7610, 7770
Total Bromine, Chlorine, Fluorine	ASTM D2361-85, D4327-84, D808-81
Total Sulfur	ASTM D 2361-85, D516-82

PART I. OPTIONAL - RECLAMATION, FUELS OR INCINERATION PARAMETERS

Please provide this optional information where known. The following parameters and suggested analytical methods may be used in obtaining these values:

Parameters	Source
1. Heat Value (BTU/lb)	ASTM D 240-85, D2015-85
2. Percent Water	ASTM D 4006-81, E203-75
3. Viscosity	Any method
4. Percent Ash	ASTM D 482-80
5. Settleable Solids	Any method
6. Vapor Pressure	Any method
7. Indicate if this waste can be transferred by pumping at an ambient temperature of 50°F. If "YES," list the type of pump required (centrifugal, gear, peristaltic, etc.).	
8. Indicate if an external source of heat can be safely used to improve the flow of this waste.	
9. Indicate if this waste is soluble in water.	
10. PARTICLE SIZE - If the waste contains any solids, indicate if they can pass through a 1/8" screen.	

PART J. TRANSPORTATION INFORMATION

1. Indicate if this waste is a USDOT Hazardous material (49CFR172.101).
2. Anticipated Annual Volume/Units - Enter the amount of this waste which will be generated and transported annually. Use appropriate units to describe this volume (e.g., cubic yards, gallons, kilograms, pounds).
3. Proper Shipping Name - Enter the proper USDOT shipping name for this waste (49CFR172.101).
4. Hazard Class - Enter the proper USDOT hazard class (49CFR172.101).
5. I.D. # - Enter the proper USDOT Identification Number (49CFR172.101).
6. Additional Description - Enter any additional shipping information required (49CFR172.203) (e.g., "RQ", the names of Hazardous Substance Constituents as they would appear on the Uniform Hazardous Waste Manifest and the packaging).
7. Method of Shipment - Indicate the anticipated method(s) of shipment by checking the appropriate box(es). If drums are to be used, see 49CFR173 for DOT drum specifications.
8. CERCLA Reportable Quantity (RQ) - Enter the Reportable Quantity for this waste from 49CFR172.101 or 40CFR302.
9. RQ Units (lb/kg) - Indicate the appropriate units for the RQ listed in #8.
10. USEPA Hazardous Waste - Indicate if this waste is a USEPA Hazardous Waste (40CFR261).
11. USEPA Hazardous Waste Number(s) - If the answer to question #10 was "YES," then enter the appropriate USEPA Hazardous Waste Number(s) (e.g., D002, F002, K028, P006, U220) (40CFR261).
12. State Hazardous Waste - Indicate if this waste is a hazardous waste as defined by the state in which it is now located.
13. State Hazardous Waste Number(s) - If the answer to question #12 was "YES," then enter the appropriate State Hazardous Waste Number(s) (e.g., for a waste now in California: 212, 213).

PART K. SPECIAL HANDLING INFORMATION

Describe those hazards which you know or reasonably believe are or may be associated with short term or prolonged human exposure to this waste (29CFR1910.1200). If known, please identify any carcinogens present in this waste in excess of 0.1% (29CFR1910.1200 (d)(4)). Attach relevant documents as a part of your response if appropriate. If documents are attached, identify those attachments. If you have a current Material Safety Data Sheet, it may be attached. Failure to make an entry in PART K is considered to be a representation that you neither know nor believe that there are any adverse human health effects associated with exposure to this waste.

Also include in PART K any additional information that will aid in the management of the waste (e.g., protective clothing, transportation, treatment, storage, disposal).

PART L. GENERATOR CERTIFICATION

An authorized employee of the generator must sign and date this certification on the completed Generator's Waste Material Profile Sheet.

MAKE A COPY OF THIS GENERATOR'S WASTE MATERIAL PROFILE SHEET FOR YOUR RECORDS. SEND THE ORIGINAL AND ATTACHMENTS TO THE ADDRESS SHOWN ON THE FRONT OF THIS WORK SET OR TO THE ADDRESS PROVIDED BY YOUR CHEMICAL WASTE MANAGEMENT, INC. SALES REPRESENTATIVE.



Chemical Waste Management, Inc.

GENERATOR'S WASTE MATERIAL PROFILE SHEET

PLEASE PRINT IN INK OR TYPE (Elite, 12-pitch).



WJ34900

J 34900

Waste Profile Sheet Code

CWM Location of Original: _____

(SHADED AREAS FOR CWM USE ONLY)

CWM Sales Rep. #: _____

A. GENERAL INFORMATION

1. Generator Name: _____ 2. Generator USEPA ID: _____
3. Facility Address: _____ 4. Generator State ID: _____
5. Zip Code: _____
6. Technical Contact: _____ 7. Title: _____ 8. Phone: () _____

B. MAIL CHEMICAL WASTE MANAGEMENT, INC. INVOICES TO

1. ☐ Generating Facility (A, above), or
2. Company Name: _____ 3. Phone: () _____
4. Address: _____
5. Zip Code: _____

C. 1. NAME OF WASTE

2. PROCESS GENERATING WASTE

3. Is this waste a Dioxin listed waste as defined in 40 CFR 261.31 (e.g., F020, F021, F022, F023, F026, F027, or F028)?
☐ Yes ☐ No If yes, **DO NOT COMPLETE** this form. Contact your Chemical Waste Management, Inc. sales representative for assistance.

D. PHYSICAL CHARACTERISTICS OF WASTE

1. Color: _____	2. Does the waste have a strong incidental odor? <input type="checkbox"/> No <input type="checkbox"/> Yes If known, describe: _____	3. Physical State @ 70°F: <input type="checkbox"/> Solid <input type="checkbox"/> Semi-Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Powder Other: _____	4. Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-layered <input type="checkbox"/> Single Phased	5. Specific Gravity: Range: _____	6. Free Liquids: <input type="checkbox"/> Yes <input type="checkbox"/> No Volume: _____ %
-----------------	--	--	--	--------------------------------------	---

7. pH: ☐ ≤ 2 ☐ > 2-4 ☐ 4-7 ☐ 7 ☐ 7-10 ☐ 10- < 12.5 ☐ ≥ 12.5 ☐ Range _____ ☐ NA

8. Liquid Flash Point: ☐ < 73°F ☐ 73-99°F ☐ 100-139°F ☐ 140-199°F ☐ ≥ 200°F ☐ None ☐ Closed Cup ☐ Open Cup

E. CHEMICAL COMPOSITION

1.	RANGE MIN. - MAX.	%
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Please note: The chemical composition total in the maximum column must be greater than or equal to 100%.

TOTAL: _____ %

2. Indicate if this waste contains any of the following:

	NONE	or	LESS THAN	or	ACTUAL
PCB's	<input type="checkbox"/>		<input type="checkbox"/> < 50 ppm		_____ ppm
Cyanides	<input type="checkbox"/>		<input type="checkbox"/> < 50 ppm		_____ ppm
Phenolics	<input type="checkbox"/>		<input type="checkbox"/> < 50 ppm		_____ ppm
Sulfides	<input type="checkbox"/>		<input type="checkbox"/> < 50 ppm		_____ ppm

F. METALS Indicate if this waste contains any of the following:

1. <input type="checkbox"/> EP TOX/TCLP	or	2. <input type="checkbox"/> Total	
METAL	LESS THAN	or	ACTUAL
	(Parts Per Million)		
Arsenic	<input type="checkbox"/> < 5	<input type="checkbox"/> < 500	_____
Barium	<input type="checkbox"/> < 100		_____
Cadmium	<input type="checkbox"/> < 1	<input type="checkbox"/> < 100	_____
Chromium	<input type="checkbox"/> < 5		_____
Lead	<input type="checkbox"/> < 5	<input type="checkbox"/> < 500	_____
Mercury	<input type="checkbox"/> < 0.2	<input type="checkbox"/> < 20	_____
Selenium	<input type="checkbox"/> < 1	<input type="checkbox"/> < 100	_____
Silver	<input type="checkbox"/> < 5		_____
Chromium-Hex	<input type="checkbox"/> < 5	<input type="checkbox"/> < 500	_____
Copper	<input type="checkbox"/> < 5		_____
Nickel	<input type="checkbox"/> < 5	<input type="checkbox"/> < 134	_____
Thallium	<input type="checkbox"/> < 5	<input type="checkbox"/> < 130	_____
Zinc	<input type="checkbox"/> < 5		_____

GENERATOR'S WASTE MATERIAL PROFILE SHEET (Continued)

J 34900

Waste Profile Sheet Code

G. OTHER HAZARDOUS CHARACTERISTICS

1. Is this waste a listed solvent waste as defined by 40 CFR 261.31 (F001, F002, F003, F004, or F005)? ☐ Yes ☐ No
2. Does this waste contain greater than 1000 ppm total halogenated organic compounds? ☐ Yes ☐ No
3. Indicate if this waste is any of the following:

<input type="checkbox"/> RCRA Reactive	<input type="checkbox"/> Radioactive
<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Etiological
<input type="checkbox"/> Explosive	<input type="checkbox"/> Pesticide Manufacturing Waste
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Other _____
<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> None of the above

H. COMPLETE ONLY FOR WASTES INTENDED FOR FUELS or INCINERATION

	LESS THAN	or	ACTUAL		
Beryllium	<input type="checkbox"/> < 5000 ppm		_____ ppm		
Potassium	<input type="checkbox"/> < 5000 ppm		_____ ppm		
Sodium	<input type="checkbox"/> < 5000 ppm		_____ ppm		
Total Bromine	<input type="checkbox"/> < 2 %		_____ %		
Total Chlorine	<input type="checkbox"/> < 35 %		_____ %		
Total Fluorine	<input type="checkbox"/> < 1 %		_____ %		
Total Sulfur			_____ %		

I. OPTIONAL — RECLAMATION, FUELS, OR INCINERATION

PARAMETERS Provide if information is available.

- Range
1. Heat Value (BTU/lb): _____ 2. Water: _____ %
 3. Viscosity (cps): _____ @ ☐ _____ °F ☐ 100°F ☐ 150°F
 4. Ash: _____ % 5. Settleable solids: _____ %
 6. Vapor Pressure @ STP (mm/Hg): _____
 7. Is this waste a pumpable liquid? ☐ Yes ☐ No
Type of pump? _____
 8. Can this waste be heated to improve flow? ☐ Yes ☐ No
 9. Is this waste soluble in water? ☐ Yes ☐ No
 10. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? ☐ Yes ☐ No

J. TRANSPORTATION INFORMATION

1. Is this a DOT Hazardous Material? ☐ Yes ☐ No
2. Anticipated Annual Volume/Units: _____ / _____
3. Proper Shipping Name: _____
4. Hazard Class: _____ 5. I.D. #: _____
6. Additional Description: (_____)
7. Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solid ☐ Drum (Type/Size): _____ / _____ Other: _____
8. CERCLA Reportable Quantity (RQ): _____ 9. RQ Units (lb/kg): _____
10. USEPA Hazardous Waste? ☐ Yes ☐ No
11. USEPA Hazardous Waste Number(s): _____
12. State Hazardous Waste? ☐ Yes ☐ No
13. State Hazardous Waste Number(s): _____

K. SPECIAL HANDLING INFORMATION

☐ Additional Page(s) Attached

L. GENERATOR CERTIFICATION I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste material, and all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

- | | |
|----------------------------------|-------------------|
| 1. _____
Signature | 2. _____
Title |
| 3. _____
Name (Type or Print) | 4. _____
Date |



Chemical Waste Management, Inc.
GENERATOR'S CERTIFICATION OF REPRESENTATIVE SAMPLE
PLEASE PRINT IN INK OR TYPE (Elite, 12-pitch).



■J34900■

J 34900

Waste Profile Sheet Code

CWM Location of Original: _____

(SHADED AREAS FOR CWM USE ONLY)

CWM Sales Rep. #: _____

This completed form must be returned, with the representative sample, to:

INSTRUCTIONS FOR COMPLETING THIS FORM ARE FOUND ON THE OPPOSITE SIDE. In order to determine whether Chemical Waste Management, Inc. can accept the special waste described in the Generator's Waste Material Profile Sheet referenced above, you must obtain and supply us with a representative sample of the waste. We may analyze the sample to verify the information that you have provided to us. A representative sample is defined as a sample obtained using any of the applicable sampling methods specified in 40 CFR 261-Appendix I or an equivalent method. Collect a representative sample of your waste and complete the form below. Apply the peel off label and ship your sample along with this form to the address noted above. If you have any questions regarding obtaining a representative sample of your waste, please refer to the instructions for this form, or contact your Chemical Waste Management, Inc. sales representative.

A. SAMPLING METHOD (Indicate which method was employed)

If sampling requirement has been waived by Chemical Waste Management, Inc., do not complete this Generator's Certification of Representative Sample form.

1. ☐ I have obtained a representative sample of the waste material described in the Generator's Waste Material Profile Sheet referenced above according to the sampling methods specified in 40 CFR 261-Appendix I.
2. ☐ I have obtained a representative sample of the waste material described in the Generator's Waste Material Profile Sheet referenced above using a method equivalent to the sampling methods described in 40 CFR 261-Appendix I.

B. SAMPLE SOURCE (e.g., drum, lagoon, pit, pond, tank, vat)

C. SAMPLE LABEL — COMPLETE LABEL BEFORE REMOVING



■J34900■

1. Waste Profile Sheet Code: _____
2. ☐ Generator's Name: _____
3. ☐ Name of Waste: _____
4. ☐ Sample Hour/Date: _____
5. ☐ Sampler's Signature: _____

1. Waste Profile Sheet Code: _____
2. Generator's Name: _____
3. Name of Waste: _____
4. Sample Hour/Date: _____
5. Sampler's Signature: _____

6. Print Sampler's Name: _____
7. Sampler's Title: _____
8. Sampler's Employer (if CWM, see D. below): _____

D. WITNESS VERIFICATION (if required) In most circumstances you will be obtaining the sample. However, in those cases in which Chemical Waste Management, Inc. obtains the sample, one of your employees must be present to direct the particular source to be sampled, to witness the sampling, and to complete this Part D.

I was personally present during the sampling described. I directed the waste source to be sampled, and I verify the information noted above.

1. Witness' Signature: _____
2. Witness' Name: _____
3. Witness' Title: _____
4. Witness' Employer: _____
5. Date: _____



Chemical Waste Management, Inc.

GENERATOR'S CERTIFICATION OF REPRESENTATIVE SAMPLE



Shaded areas are for CWM use only.

PART A. SAMPLING METHOD

Questions concerning sample waiver should be referred to your Chemical Waste Management, Inc. Sales Representative. Check the sampling method employed.

This sample should be collected in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods", SW846, USEPA, Office of Solid Waste, Washington, D.C. 20460 and/or 40CFR261-Appendix I. A suitable sample container for most wastes is a wide mouth glass bottle with a plastic cap having a non-reactive liner. Plastic containers are recommended for strong caustics or fluorides. Fill to approximately 90% of capacity to allow for expansion during transportation. The peel off label on this form must be completed prior to removal from the form. Ultimately, the label must be attached to the sample container, not the shipping container.

If this waste is a hazardous material, the sample must be packaged and shipped in accordance with USDOT regulations (49CFR171.2) and any specific requirements imposed by the carrier. Improperly packaged samples may be disposed of upon receipt.

PART B. SAMPLE SOURCE

The sampler is to describe exactly from where the sample was taken (e.g. conveyor, drum, lagoon, pipe, pit, pond, tank, vat).

PART C. SAMPLE LABEL

THE SAMPLE LABEL MUST BE COMPLETED BEFORE IT IS REMOVED FROM THIS FORM

Apply the completed peel off label to the container which actually holds the sample - not to the shipping carton. DO NOT WRITE ON THE BAR CODE (if present).

1. WASTE PROFILE SHEET CODE - If not preprinted, enter the appropriate Waste Profile Sheet Code. This Certification and its peel off label must be used to identify **ONLY** the sample of the waste described in the Generator's Waste Material Profile Sheet bearing the same Waste Profile Sheet Code.
2. GENERATOR'S NAME - Enter the name of the generating facility.
3. NAME OF WASTE - Enter a name which is generally descriptive of this waste (e.g., cyanide plating waste, paint sludge, PCB contaminated dirt, still bottoms, wastewater treatment sludge) as it appears on the Generator's Waste Material Profile Sheet.
4. SAMPLE HOUR/DATE - Enter the hour and date sample was collected.
5. SAMPLER'S SIGNATURE - The sampler must sign in the space provided.
6. PRINT SAMPLER'S NAME - Enter the sampler's name.
7. SAMPLER'S TITLE - Enter the sampler's title.
8. SAMPLER'S EMPLOYER (If CWM, See D. Below) - Enter the sampler's employer's name.

Remove the completed peel off label and affix it to the sample container at the time of sampling. If this label is lost or destroyed, the sample must be labeled with equivalent information, including the Waste Profile Sheet Code. If the Certification of Representative Sample Form is lost or destroyed, please contact your Chemical Waste Management, Inc. Sales Representative to obtain a new one.

PART D. WITNESS VERIFICATION (if required):

In the event that a Chemical Waste Management, Inc. employee obtains the sample on your site, one of your employees must be present to direct our employee to the sample source and to witness the sampling. Your employee must also provide the information requested in this PART D.

1. WITNESS' SIGNATURE - Sign in the space provided.
2. WITNESS' NAME - Print the name of the person who witnessed the sampling.
3. WITNESS' TITLE - Enter the witness' title.
4. WITNESS' EMPLOYER - Enter the witness' employer's name.
5. DATE - Enter the date the sampling event was witnessed.

SCA CHEMICAL SERVICES



ILLINOIS GENERATOR I.D. NUMBER

EACH WASTE PRODUCT APPROVED BY SCA WILL BE CLASSIFIED UNDER ONE OF OUR GENERIC PERMIT NUMBERS. FOR THIS REASON, IT IS IMPORTANT THAN AN ILLINOIS GENERATOR I.D. NUMBER BE OBTAINED. IN ADDITION, WHEN SHIPPING WASTE TO SCA, YOU WILL REQUIRE AN ILLINOIS HAZARDOUS WASTE MANIFEST. IN ORDER TO OBTAIN MANIFESTS FROM THE STATE, YOU MUST HAVE AN I.D. NUMBER. SCA CHEMICAL SERVICES CANNOT PROVIDE MANIFESTS.

**INSTRUCTIONS FOR COMPLETING
ILLINOIS GENERATOR I.D. NUMBER REQUEST FORM**

Generator I.D. numbers are normally assigned from data provided in Supplemental Waste Stream Permit Applications submitted by permitted treatment, storage or disposal sites. Generator I.D. numbers are automatically assigned to those generators who do not have one when waste stream permit applications are received. This form is to be used by those generators that ship all of their waste out-of-state or only to Illinois TSD facilities having a generic permit to accept the generator's waste stream.

Please TYPE or PRINT LEGIBLY in ink. INCOMPLETE FORMS WILL BE REJECTED.

COMPLETING THE FORM

List the name, company and telephone number of the person requesting the generator number.

Indicate the generator's official business name, location (P.O. box numbers are not acceptable), city, state, zip code, county, mailing address (if applicable), contact person, and business phone.

Frequency of Transportation - this information is needed in order to determine how many manifest forms will be needed. Please check one.

Provide the waste destination (TSD facility) name, address, and generic permit authorization number or Illinois site code # (out-of-state facilities only). This information is available from the TSD facility.

Sign and date the Authorization Statement and return this form to the Illinois Environmental Protection Agency.

This form will be returned to the generator via UPS delivery when a generator number has been assigned. A supply of manifests and a manifest order form will be enclosed for the generator's use.

GENERAL INFORMATION

It will take approximately three (3) weeks to process your generator number request. Please schedule waste shipments after the expected receipt date of your generator number package.

Generator numbers will be assigned only on receipt of this request form. Telephone requests will not be accepted. Requests for information on numbers previously assigned must be submitted, in writing, to the Permit Section.

Questions regarding completion of this form may be directed to Carrie Agrall at 217/782-6762.

CLA:tk:5/8/46-2(3/17/83)

This Agency is authorized to release this information under Illinois Revised Statutes, 1973, Chapter 111, Section 103.2. Disclosure of this information is requested under that Section. Failure to do so may constitute a violation of the Freedom of Information Act. This document contains neither recommendations nor conclusions of the Agency. It is the property of the Agency and is loaned to your organization; it and its contents are not to be distributed outside your organization.



Illinois Environmental Protection Agency • P.O. Box 19276, Springfield, IL 62794-9276

ILLINOIS GENERATOR I.D. NUMBER REQUEST FORM

This form supersedes all previous editions. Effective May 1, 1988 all requests not submitted on this form will be rejected. See reverse side for instructions for completing this form.

This number is being requested by _____

of (Company) _____ PHONE _____

GENERATOR NAME _____

LOCATION (Not P.O. Box) _____

CITY, STATE & ZIP CODE _____ COUNTY _____

MAILING ADDRESS (if different than above) _____

CITY, STATE & ZIP CODE _____

CONTACT PERSON _____ PHONE _____

FREQUENCY OF TRANSPORTATION (check one).

☐ 1 = one time only ☐ 3 = weekly ☐ 5 = monthly ☐ 7 = quarterly
☐ 2 = daily ☐ 4 = bi-weekly ☐ 6 = bi-monthly ☐ 8 = semi-annual

WASTE DESTINATION (TSD Facility) _____

ADDRESS _____

CITY, STATE & ZIP CODE _____

* Indicate TSD's Illinois Site Code Number (if Out-of-State) or Generic Permit Authorization Number (of Illinois TSD Facility) (MUST BE COMPLETED).

AUTHORIZATION STATEMENT

I authorize this request for assignment of an Illinois generator number. This company has not previously shipped waste under the Illinois Manifest System. If my waste is a RCRA hazardous waste, I certify this company has a USEPA generator I.D. number.

Signature of Generator: _____

Title: _____ (Owner or Operator) Date: _____

Return this form to: Illinois Environmental Protection Agency
Division of Land Pollution Control (#24)
Permit Section
2200 Churchill Road
P. O. Box 19276
Springfield, IL 62794-9276

FOR AGENCY USE ONLY

GENERATOR I.D. # _____

EDP _____
Region _____
IMES/Manifest _____
File _____

WESTON ANALYTICS
PCB ANALYTICAL DATA PACKAGE FOR
GMC-FISHER GUIDE

DATE RECEIVED: 07/07/88

RFW LOT # :8807-920

CLIENT ID	RFW #	MTX	PREP #	COLLECTION	EXTR/PREP	ANALYSIS
PBLK	MB1	S	88E745	N/A	07/08/88	07/15/88
PBLK	MB1 BS	S	88E745	N/A	07/08/88	07/15/88
PBLK	MB1	S	88E746	N/A	07/08/88	07/15/88
PBLK	MB1 BS	S	88E746	N/A	07/08/88	07/15/88



Custody Transfer Record/Lab Work Request

Received By J. J. G. L.

Date 7-7-88

Assigned to _____

Client GMC-Fisher Guide, SFR RFW Contact Bill Dinnigan
Client Contact William Kochem, Jr. Date Due 7-21-88
Phone 315-432-5314 Project Number 118-41-01

8807-420

SAMPLE IDENTIFICATION

ANALYSES REQUESTED

Sample No.	Client ID No.	Description	Matrix	Date Collected	Container/Preservative	PCBs													
Gm-Pw1-01D	GMC-FG	Lagoon Water	W	7-6-88	Glass / Cool	✓													
Gm-FB-01	"	Field Blank	W	7-6-88	" "	✓													
Gm-Pw1-01	"	"	W	7-6-88	" "	✓													
Gm-Pw2-01	"	Lagoon Water	W	7-6-88	" "	✓													
Gm-Filtrate	"	Sediment Filtrate	W	7-6-88	Glass / Cool	✓													
Gm-P1-5A	"	Lagoon Sediment	S	7-6-88	Glass / Cool	✓													
Gm-P1-7B	"	"	S	7-6-88	" "	✓													
Gm-P1-5B	"	(Duplicate) " "	S	7-6-88	" "	✓													
Gm-P1-5B Dup	"	(Duplicate) " "	S	7-6-88	" "	✓													
Gm-P1-6A	"	Lagoon Sediment	S	7-6-88	" "	✓													
Gm-P2-2AB	"	"	S	7-6-88	" "	✓													
Gm-P2-3A	"	"	S	7-6-88	" "	✓													
Gm-P1-3A	"	"	S	7-6-88	" "	✓													
Gm-P2-1B	"	"	S	7-6-88	" "	✓													
Gm-P2-3B	"	"	S	7-6-88	" "	✓													
Gm-P2-2A	GMC-FG	Lagoon Sediment	S	7-6-88	Glass / Cool	✓													

Matrix:

S- Soil DS- Drum Solids
W- Water DL- Drum Liquids
O- Oil X- Other

Special Instructions:

2WK TAT.

Items/Reason	Relinquished By	Received By	Date	Time	Items/Reason	Relinquished By	Received By	Date	Time
16/PCB Anal.	John Mooney	Allegie	7-6-88	7:00pm					
	J. J. G. L.		7/7/88	7:30am					



Custody Transfer Record/Lab Work Request

Received By P. HerglerClient GMC-Fisher GuideRFW Contact Bill DinniganDate 7-21-88Client Contact William KocherDate Due 7-21-88

Assigned to _____

Phone 315-432-5314Project Number 1138-41-01

8:07-9:10

SAMPLE IDENTIFICATION

ANALYSES REQUESTED

Sample No.	Client ID No.	Description	Matrix	Date Collected	Container/Preservative														
7	Gm-PI-2A	GMC/FG	PCB Pond Sediment	Soil	7-6-88	Glass Jar/Cool	PCB's												
8	Gm-PI-9A	GMC/FG	Pond Sediment	S	7-6-88	" "	"												
9	Gm-PI-6C	"	"	S	7-6-88	" "	"												
10	Gm-PI-6A	"	"	S	7-6-88	" "	"												
11	Gm-PI-9C	"	"	S	7-6-88	" "	"												
12	Gm-PI-5C	"	"	S	7-6-88	" "	"												
13	Gm-PI-7C	"	"	S	7-6-88	" "	"												
14	Gm-PI-8A	"	"	S	7-6-88	" "	"												
15	Gm-PI-8C	"	"	S	7-6-88	" "	"												
16	Gm-PI-9B	"	"	S	7-6-88	" "	"												
17	Gm-PI-10C	GMC/FG	Pond Sediment	S	7-6-88	Glass Jar/Cool	PCB's												
18	Gm-PI-8B	"	"	S	7-6-88	" "	"												
19	Gm-PI-4C	"	"	S	7-6-88	" "	"												
20	Gm-PI-4A	"	"	S	7-6-88	" "	"												
21	Gm-PI-3B	GMC/FG	Pond Sediment	S	7-6-88	Glass Jar/Cool	PCB's												

Matrix:

S- Soil DS- Drum Solids
W- Water DL- Drum Liquids
O- Oil X- Other

Special Instructions:

Items/Reason	Relinquished By	Received By	Date	Time	Items/Reason	Relinquished By	Received By	Date	Time
15 PCB Analysis	John Mooney	P. Hergler	7/6/88	7:00 pm					
	Chad E. H	P. Hergler	7/7/88	9:30 am					

WESTON Analytics - Dedicated Lab

CLIENT: GMC-FISHER GUIDE
RFW # : 8807-920
W.O.# : 1138-41-01-0000

DATA QUALIFIER

1. The following qualifiers are used on the data summary:

U - Indicates that the compound was analyzed for but not detected. The minimum detection limit for the sample (not the method detection limit) is reported with the U (e.g., 10U).

J - Indicates an estimated value. This flag is used in cases where a target analyte is detected at a level less than the lower quantification level. If the limit of quantification is 10 ug/L and a concentration of 3 ug/L is calculated, it is reported as 3J.

BS - Indicates blank spike in which reagent grade water is spiked with the CLP matrix spiking solutions and carried through all the steps in the method. Spike recoveries are reported.

BSD - Indicates blank spike duplicate.

MS - Indicates matrix spike.

MSD - Indicates matrix spike duplicate.

DL - Indicates that surrogate recoveries were not obtained because the extract had to be diluted for analysis.

NA - Not applicable.

DF - Dilution factor.

NR - Not required.

I - Interference.


J. Michael Taylor
Project Director
Lionville Analytical Laboratory

7-21-88
DATE

WESTON ANALYTICS
PCBs by GC

Report Date: 07/20/88 14:07

RFW Batch Number: 8807-920

Client: GMC FISHER GUIDE

Work Order: 1138-41-01-0000

Page: 1

	Cust ID:	GM-PW1-01D L AGOON WA	GM-FB-01	GM-PW1-01	GM-PW2-01	GM-FILTRATE	GM-P1-5A
Sample Information	RFW#:	001	002	003	004	005	006
	Matrix:	WATER	WATER	WATER	WATER	WATER	SEDIMENT
	D.F.:	1.00	1.00	10.0	1.00	10.0	1000
	Units:	UG/L	UG/L	UG/L	UG/L	UG/L	UG/KG
=====f)=====f)=====f)=====f)=====f)=====f)=====							
Analyte:							
Aroclor-1016		0.50 U	0.50 U	5.0 U	0.50 U	5.3 U	640000 U
Aroclor-1221		0.50 U	0.50 U	5.0 U	0.50 U	5.3 U	640000 U
Aroclor-1232		0.50 U	0.50 U	5.0 U	0.50 U	5.3 U	640000 U
Aroclor-1242		4.2	0.50 U	16	0.95	15	2700000
Aroclor-1248		0.50 U	0.50 U	5.0 U	0.50 U	5.3 U	640000 U
Aroclor-1254		1.0 U	1.0 U	10 U	1.0 U	11 U	1300000 U
Aroclor-1260		1.0 U	1.0 U	10 U	1.0 U	11 U	1300000 U

	Cust ID:	GM-P1-7B	GM-P1-7B	GM-P1-7B	GM-P1-5B	GM-P1-5B DUP	GM-P1-6A
Sample Information	RFW#:	007	007 MS	007 MSD	008	009	010
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	2000	2000	2000	2000	2000	2000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
=====f)=====f)=====f)=====f)=====f)=====f)=====							
Analyte:							
Aroclor-1016		1400000 U	1400000 U	1300000 U	1900000 U	1500000 U	2000000 U
Aroclor-1221		1400000 U	1400000 U	1300000 U	1900000 U	1500000 U	2000000 U
Aroclor-1232		1400000 U	1400000 U	1300000 U	1900000 U	1500000 U	2000000 U
Aroclor-1242		2600000	2500000	2400000	3900000	3300000	6600000
Aroclor-1248		1400000 U	1400000 U	1300000 U	1900000 U	1500000 U	2000000 U
Aroclor-1254		2700000 U	DL %	DL %	3800000 U	3000000 U	4100000 U
Aroclor-1260		2700000 U	2900000 U	2700000 U	3800000 U	3000000 U	4100000 U

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WESTON ANALYTICS
PCBs by GC

Report Date: 07/20/88 14:07

RFW Batch Number: 8807-920

Client: GMC FISHER GUIDE

Work Order: 1138-41-01-0000

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	Cust ID:	GM-P2-2AB	GM-P2-3A	GM-P2-3A	GM-P1-3A	GM-P2-1B	GM-P2-3B
Sample Information	RFW#:	011	012	012 REP	013	014	015
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	100	1000	1000	1000	100	1000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
=====f)=====f)=====f)=====f)=====f)=====f)=====							
Analyte:							
Aroclor-1016		39000 U	420000 U	410000 U	1100000 U	40000 U	390000 U
Aroclor-1221		39000 U	420000 U	410000 U	1100000 U	40000 U	390000 U
Aroclor-1232		39000 U	420000 U	410000 U	1100000 U	40000 U	390000 U
Aroclor-1242		610000	450000	500000	2100000	35000 J	230000 J
Aroclor-1248		39000 U	420000 U	410000 U	1100000 U	40000 U	390000 U
Aroclor-1254		77000 U	840000 U	820000 U	2300000 U	80000 U	780000 U
Aroclor-1260		77000 U	840000 U	820000 U	2300000 U	80000 U	780000 U

	Cust ID:	GM-P2-2A	GM-P1-2A	GM-P1-9A	GM-P1-6C	GM-P1-10A	GM-P1-9C
Sample Information	RFW#:	016	017	018	019	020	021
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	500	2000	500	1000	500	2000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG
=====f)=====f)=====f)=====f)=====f)=====f)=====							
Analyte:							
Aroclor-1016		260000 U	1100000 U	1000000 U	710000 U	210000 U	1800000 U
Aroclor-1221		260000 U	1100000 U	1000000 U	710000 U	210000 U	1800000 U
Aroclor-1232		260000 U	1100000 U	1000000 U	710000 U	210000 U	1800000 U
Aroclor-1242		250000 J	5200000	1000000	2100000	220000	6400000
Aroclor-1248		260000 U	1100000 U	1000000 U	710000 U	210000 U	1800000 U
Aroclor-1254		510000 U	2300000 U	2000000 U	1400000 U	420000 U	3700000 U
Aroclor-1260		510000 U	2300000 U	2000000 U	1400000 U	420000 U	3700000 U

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WESTON ANALYTICS
PCBs by GC

Report Date: 07/20/88 14:07

RFW Batch Number: 8807-920

Client: GMC FISHER GUIDE

Work Order: 1138-41-01-0000

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	Cust ID:	GM-P1-5C	GM-P1-7C	GM-P1-8A	GM-P1-8C	GM-P1-9B	GM-P1-10C
Sample Information	RFW#:	022	023	024	025	026	027
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	1000	1000	1000	1000	2000	1000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG

Analyte:							
Aroclor-1016		700000 U	1200000 U	1300000 U	810000 U	1300000 U	520000 U
Aroclor-1221		700000 U	1200000 U	1300000 U	810000 U	1300000 U	520000 U
Aroclor-1232		700000 U	1200000 U	1300000 U	810000 U	1300000 U	520000 U
Aroclor-1242		3100000	2200000	3000000	5100000	3300000	960000
Aroclor-1248		700000 U	1200000 U	1300000 U	810000 U	1300000 U	520000 U
Aroclor-1254		1400000 U	2500000 U	2500000 U	1600000 U	2700000 U	1000000 U
Aroclor-1260		1400000 U	2500000 U	2500000 U	1600000 U	2700000 U	1000000 U

	Cust ID:	GM-P1-8B	GM-P1-4C	GM-P1-4C	GM-P1-4A	GM-P1-3B	GM-P1-3B
Sample Information	RFW#:	028	029	029 REP	030	031	031 MS
	Matrix:	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT	SEDIMENT
	D.F.:	100	100	100	2000	2000	2000
	Units:	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG	UG/KG

Analyte:							
Aroclor-1016		150000 U	110000 U	110000 U	840000 U	1000000 U	1000000 U
Aroclor-1221		150000 U	110000 U	110000 U	840000 U	1000000 U	1000000 U
Aroclor-1232		150000 U	110000 U	110000 U	840000 U	1000000 U	1000000 U
Aroclor-1242		2400000	520000	410000	2700000	4900000	6000000
Aroclor-1248		150000 U	110000 U	110000 U	840000 U	1000000 U	1000000 U
Aroclor-1254		290000 U	210000 U	220000 U	1700000 U	2000000 U	DL %
Aroclor-1260		290000 U	210000 U	220000 U	1700000 U	2000000 U	2100000 U

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WESTON ANALYTICS
PCBs by GC

Report Date: 07/20/88 14:07

RFW Batch Number: 8807-920

Client: GMC FISHER GUIDE

Work Order: 1138-41-01-0000

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	Cust ID:	GM-P1-3B	PBLK	PBLK BS	PBLK BSD	PBLK	PBLK BS
Sample Information	RFW#:	031 MSD	88E744-MB1	88E744-MB1	88E744-MB1	88E745-MB1	88E745-MB1
	Matrix:	SEDIMENT	WATER	WATER	WATER	SOIL	SOIL
	D.F.:	2000	1.00	1.00	1.00	0.500	5.00
	Units:	UG/KG	UG/L	UG/L	UG/L	UG/KG	UG/KG
=====f]=====f]=====f]=====f]=====f]=====f]=====f]							
Analyte:							
Aroclor-1016		1100000 U	0.50 U	0.50 U	0.50 U	120 U	1200 U
Aroclor-1221		1100000 U	0.50 U	0.50 U	0.50 U	120 U	1200 U
Aroclor-1232		1100000 U	0.50 U	0.50 U	0.50 U	120 U	1200 U
Aroclor-1242		2900000	0.50 U	0.50 U	0.50 U	110 J	1200 U
Aroclor-1248		1100000 U	0.50 U	0.50 U	0.50 U	120 U	1200 U
Aroclor-1254		DL %	1.0 U	115 %	117 %	240 U	113 %
Aroclor-1260		2100000 U	1.0 U	1.0 U	1.0 U	240 U	2400 U

	Cust ID:	PBLK	PBLK BS
Sample Information	RFW#:	88E746-MB1	88E746-MB1
	Matrix:	SOIL	SOIL
	D.F.:	0.500	0.500
	Units:	UG/KG	UG/KG
=====f]=====f]=====f]=====f]=====f]=====f]=====f]			
Analyte:			
Aroclor-1016		120 U	120 U
Aroclor-1221		120 U	120 U
Aroclor-1232		120 U	120 U
Aroclor-1242		31 J	120 U
Aroclor-1248		120 U	120 U
Aroclor-1254		240 U	126 %
Aroclor-1260		240 U	240 U

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SAMPLE EXTRACTION RECORD

Sheet No: 1

Inact. Date: 07/08/88

Extraction Batch No: 88E744

Analyst: MM

Method: LIQ-LIQ

Test: JPCB

Cleanup Date:

Analyst: EAL

Client: SMC FISHER

Solvent: DCM/HEX

Absorbent: 42584

Sample No:	Client ID	pH	Initial WT/VOL	Surr. Mult.	Spice Mult.	Final VOL	Final VOL N/A	Spice Mult.	% Solids	C/D FACTOR
728-										
801		7.00	1000	1		10		1.00		10.00
802		7.00	1000	1		10		1.00		10.00
803		7.00	1000	1		10		1.00		10.00
804		7.00	1000	1		10		1.00		10.00
805		7.00	950	1		10		1.00		10.00
744-MS:		7.00	1000	1		10		1.00		10.00
744-MS: 3		7.00	1000	1	1	10		1.00		10.00
744-MS: 7		7.00	1000	1	1	10		1.00		10.00

Comments:

Analogate: 100 UL 100-45 S 1.789 US/UL

1KE: 10 UL 950-45 S 0.3 US/UL

Contracts Transferred	Relinquished By	Date Time	Received By	Date Time	Reason for Transfer

SAMPLE EXTRACTION RECORD

Sheet No: 1

Inact. Date: 67/06/86

Extraction Batch No: 88E745

Analyst: MMH

Method: SOXHLET

Test: OPCR

Cleanup Date:

Analyst: EAL

Client: GPC FISHER

Solvent: HEX/ACETONE

Adsorbent: H2S04

Sample No:	Client ID	pH	Initial WT/VOL	Surr. Mult.	Spike Mult.	Final VOL	Final VOL N/A	Split Mult.	% Solids	C/D FACTOR
926-										
006		9.8		1		10			38.00	2685.264
007		10.7		1		10			33.00	2832.058
007 S		10.1		1	10	10			33.00	3000.300
007 T		10.0		1	10	10			33.00	2700.094
008		10		1		10			25.00	4000
009		10.1		1		10			28.00	3132.832
010		10.2		1		10			20.00	4237.200
011 - 2		10.1		1		10			61.00	1607.200
012 - 2		9.7		1		10			59.00	1747.350
012 P - 2		9.9		1		10			59.00	1712.035
013		10.0		1		10			20.00	4716.901
014 - 2		10.7		1		10			56.00	1668.891
015 - 2		10.4		1		10			59.00	1629.726
016 - 2		10		1		10			47.00	2127.659
017		10.1		1		10			42.00	2357.370
018		10		1		10			12.00	8333.333
019		10.0		1		10			32.00	2948.113
020		10.5		1		10			40.00	1739.130
021		10.9		1		10			24.00	3822.620
022		10.7		1		10			32.00	1928.560
023		10.2		1		10			18.00	5144.032
024		10.1		1		10			19.00	5211.047
025		11		1		10			27.00	3367.003
15-MB1		10		1		10			100.00	1000
15-MB1 S		10		1	10	10			100.00	1000

Notes: 1.0 ML ACID CLEANED AND GIVEN TO ANALYST
 Negative: 100 UL BB7-455 & 1.000 US/UL
 Net: 100 UL PROCELOS 1250 & 1.003 US/UL

Specs Transferred	Relinquished By	Date Time	Received By	Date Time	Reason for Transfer

SAMPLE EXTRACTION RECORD

Sheet No: 1

Act. Date: 07/09/88 Extraction Batch No: 98E746 Analyst: MAF Method: SOXHLET
 Test: OPCS Cleanup Date: Analyst: EA Client: GNC FISHER
 Solvent: HEXACETONE Adsorbent: H2SO4

File No:	Client	pH	Initial WT/VOL	Surr. Mult.	Spike Mult.	Final VOL	Final VOL N/A	Split: Mult.	% Solids	C/D FACTOR
920-										
026		11.7		1	10				32.00	2765.486
027		12.0		1	10				36.00	3170.138
029		10.2		1	10				16.00	6127.450
029		10.7		1	10				21.00	1456.178
029 R		10.0		1	10				21.00	4492.360
032		12.4		1	10				40.00	1753.155
031		12.1		1	10				40.00	2121.337
031 S		12.1		1	10				40.00	2152.389
031 T		9.5		1	10				40.00	2195.871
746-MB1		10		1	10				100.00	1000
746-MB1 S		10		1	10				100.00	1000

Comments: 1.0 ML ACID CLEANER AND GIVEN TO ANALYST
 Urrogate: 100 UL 100-455 @ 1.989 LB/UL
 Spike: 100 UL 1000-455 @ 1.323 LB/UL

Extracts Transferred	Relinquished By	Date Time	Received By	Date Time	Reason for Transfer

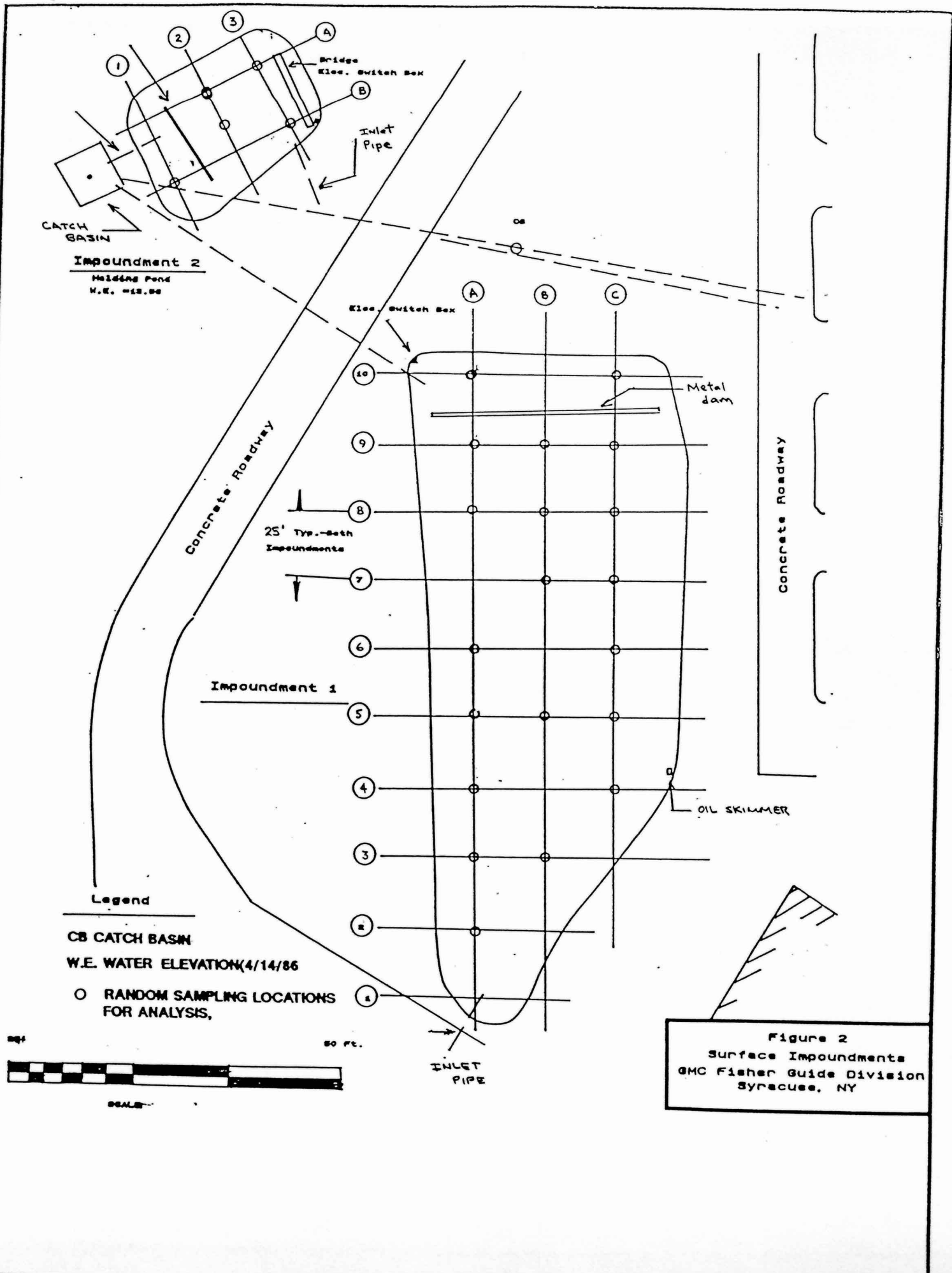
GMC FISHER GUIDE DIVISION

PCB DATA SUMMARY

<u>Client ID</u>	<u>RFW No.</u>	<u>Matrix</u>	<u>Aroclor 1242 mg/kg, dry wt.</u>	<u>Aroclor 1242 mg/kg, wet wt.¹</u>
GM-PW1-01D	001	Water	—	0.0042
GM-FB-01	002	Water	—	ND
GM-PW1-01	003	Water	—	0.016
GM-PW2-01	004	Water	—	0.00095
GM-Filtrate	005	Water	—	0.014
GM-P1-5A	006	Sedim	2,700	1,026
GM-P1-7B	007	Sedim	2,600	858
GM-P1-5B	008	Sedim	3,900	975
GM-P1-5BD	009	Sedim	3,300	924
GM-P1-6A	010	Sedim	6,600	1,320
GM-P2-2AB	011	Sedim	610	372
GM-P2-3A	012	Sedim	450	266
GM-P2-3A	012 REP	Sedim	500	295
GM-P1-3A	013	Sedim	2,100	420
GM-P2-1B	014	Sedim	35	19.6
GM-P2-3B	015	Sedim	230	136
GM-P2-2A	016	Sedim	250	118
GM-P1-2A	017	Sedim	5,200	2,184
GM-P1-9A	018	Sedim	1,000	120
GM-P1-6C	019	Sedim	2,100	672
GM-P1-10A	020	Sedim	220	101
GM-P1-9C	021	Sedim	6,400	1,536
GM-P1-5C	022	Sedim	3,100	992
GM-P1-7C	023	Sedim	2,200	396
GM-P1-8A	024	Sedim	3,000	570
GM-P1-8C	025	Sedim	5,100	1,377
GM-P1-9B	026	Sedim	3,300	1,056
GM-P1-10C	027	Sedim	960	346
GM-P1-8B	028	Sedim	2,400	384
GM-P1-4C	029	Sedim	520	109
GM-P1-4C	029 REP	Sedim	410	86
GM-P1-4A	030	Sedim	2,700	1,242
GM-P1-3B	031	Sedim	4,900	2,205

¹ PCB concentrations were reported on a dry weight basis. To convert to mg/kg wet weight:
 (% solids in sample) x (dry weight concentration)
 = wet weight concentration.

Example: for Sample 006,
 (.38) x (2,700 mg/kg) = 1,026 mg/kg.





Chemical Waste Management, Inc.

GENERATOR'S WASTE MATERIAL PROFILE SHEET WORKSET



Return this completed workset to:

GENERAL INSTRUCTIONS

This workset contains two forms:

- GENERATOR'S WASTE MATERIAL PROFILE SHEET
- GENERATOR'S CERTIFICATION OF REPRESENTATIVE SAMPLE

1. The Generator's Waste Material Profile Sheet is a two-sided form. Both sides must be completed.
2. This document is perforated so the forms and instructions may be separated for your convenience. If the forms are separated, take special precautions to assure that they are used to describe and identify **ONLY** the same waste.
3. Shaded areas on the forms are for Chemical Waste Management use only.
4. Answers must be made to all questions with the exception of PART I, "Reclamation, Fuels or Incineration Parameters," which is optional.
5. Answers must be printed in ink or typed (elite, 12-pitch).
6. Instructions are included to help you complete these forms correctly. The letters and numbers which precede each instruction refer to the lettered and numbered entries on the forms.
7. Both the Generator's Waste Material Profile Sheet and the Generator's Certification of Representative Sample forms must be signed.
8. The Certification of Representative Sample and its peel off Sample Label must be used to identify **ONLY** the sample of the waste described on the attached Generator's Waste Material Profile Sheet.
9. The peel off label must be completed before removal from the form and applied to the container which actually holds the sample material - **not** on the shipping carton - even if the sample already has another label.
10. If you have any questions concerning the use of these forms, please contact your Chemical Waste Management Sales Representative or the office that issued this workset to you.
11. **MAKE A COPY OF THESE FORMS FOR YOUR RECORDS. SEND THE ORIGINALS AND ALL ATTACHMENTS TO THE ADDRESS SHOWN ABOVE OR TO THE ADDRESS PROVIDED BY YOUR CHEMICAL WASTE MANAGEMENT, INC. SALES REPRESENTATIVE.**



Chemical Waste Management, Inc.

GENERATOR'S WASTE MATERIAL PROFILE SHEET



This information is required for a waste to be considered for transportation, treatment, storage or disposal. It is used to determine if the waste may be transported, treated, stored or disposed in a legal, safe, and environmentally sound manner. This information will be maintained in strict confidence. **ANSWERS MUST BE MADE TO ALL QUESTIONS** and must be printed in ink or typed (elite, 12-pitch). A response of "NONE," or "NA" can be made if appropriate.

Shaded areas are for CWM use only.

PART A. GENERAL INFORMATION

1. GENERATOR NAME - Enter the name of the generating facility.
2. GENERATOR USEPA ID - Enter the twelve character alpha-numeric descriptor issued by the USEPA to the facility generating the waste.
3. FACILITY ADDRESS - Enter the street address (not P.O. Box) of the generating facility.
4. GENERATOR STATE ID - Enter the descriptor issued by the state to the facility generating the waste (if applicable).
5. ZIP CODE - Enter the generating facility's five or nine digit zip code.
6. TECHNICAL CONTACT - Enter the name of a person who will answer technical questions about the waste.
7. TITLE - Enter technical contact's title.
8. PHONE - Enter technical contact's telephone number.

PART B. MAIL CHEMICAL WASTE MANAGEMENT INC. INVOICES TO:

1. If you want the invoice mailed to the same address as in PART A, check "Generating Facility." If you want the invoices mailed elsewhere, then indicate the name, phone, and address, as shown in numbers 2 through 5.
2. COMPANY NAME - Enter the name of the company to which you want the invoices sent.
3. PHONE - Enter the telephone number of the company to which you want the invoices sent.
4. ADDRESS - Enter the address of the company to which you want the invoices sent.
5. ZIP CODE - Enter the five or nine digit zip code of the company to which you want the invoices sent.

PART C.

1. NAME OF WASTE - Enter a name that is generally descriptive of this waste (e.g., cyanide plating waste, paint sludge, PCB contaminated dirt, still bottoms, wastewater treatment sludge).
2. PROCESS GENERATING WASTE - List the specific process/operation or source that generates the waste (e.g., metal plating operation, paint spray booth, PCB spill, solvent recovery, wastewater treatment plant).
3. DIOXIN WASTE - Treatment, storage or disposal of Dioxin wastes requires special attention. If this waste is a USEPA listed Dioxin waste, indicate "YES" and contact your Chemical Waste Management Sales Representative. If "YES", **DO NOT COMPLETE THE REMAINDER OF THIS FORM.**

PART D. PHYSICAL CHARACTERISTICS OF WASTE

1. COLOR - Describe the color of the waste (e.g., blue, clear, varies).
2. ODOR - **DO NOT SMELL THE WASTE!** If the waste has a known incidental odor, then describe it (e.g., acrid, pungent, solvent, sweet).
3. PHYSICAL STATE - If the four boxes provided do not apply, a descriptive phrase may be entered after "Other" (e.g., gas).
4. LAYERS - Check all applicable boxes. Multi-layered means more than two layers (e.g., oil/water/sludge). Bi-layered means the waste is comprised of two layers which may or may not be of the same phase (e.g., oil/water, solvent/sludge). Single phased means the waste is homogeneous.
5. SPECIFIC GRAVITY - Indicate the range. The specific gravity of water is 1.0. Most organics are less than 1.0. Chlorinated solvents, most inorganics and paint sludge are greater than 1.0.
6. FREE LIQUIDS - Check "YES" if liquid is usually present when packaging for shipment and estimate the percent of liquid volume. Check "NO" if there are no free liquids as defined by the Paint Filter Test (SW 846 Method 9095).
7. pH - Indicate for liquid or liquid portions of the waste. Check the appropriate boxes which cover the pH of the waste. Use the "Range" space if appropriate. For solid or organic liquid wastes, indicate the pH of a 10% aqueous solution of the waste if applicable. Check "NA" for non-water soluble materials (e.g., bricks, dismantled tanks, empty drums, gases, rocks).
8. LIQUID FLASH POINT - Indicate the liquid flash point obtained using the appropriate testing method (40CFR261.21). The liquid flash point is important from a transportation standpoint (49CFR173.115). Solids with flammable potential should be identified in PART G.3 (e.g., Pyrophoric, RCRA Reactive, Other).

PART E. CHEMICAL COMPOSITION

1. List all organic and/or inorganic components of the waste using **specific chemical names**. If trade names are used, attach Material Safety Data Sheets or other documents which adequately describe the composition of the waste. For each component, estimate the range (in percents) in which the component is present. In case of extreme pH (2 or less or 12.5 or greater) indicate specific acid or caustic species present. This list must include any hazardous components listed in PARTs F, G, and/or H which exceed 10,000 ppm (1%). The total of the maximum values of the components must be greater than or equal to 100% including water, earth, etc.
2. If this waste contains PCBs, cyanides, phenolics or sulfides, indicate the concentration(s). If this waste does not contain these constituents, indicate by checking the "NONE" box(es) which apply. If the concentration of these constituents is unknown, please indicate "UNK" under "ACTUAL."

PART F. METALS

Indicate whether metals content was determined by EP Tox (extraction procedure toxicity)/TCLP (Toxicity Characteristics Leaching Procedure) from 40CFR261-Appendix II or represents the total metals. For each metal, check only one box indicating that the metal content will not exceed the stated amount or enter the actual metal content indicated by your test results in the "ACTUAL" column in parts per million. If you know a metal is **NOT** present, indicate by writing "NA" under "ACTUAL." An actual concentration of zero is not appropriate. If metal concentrations are unknown, please indicate "UNK" under "ACTUAL."

PART G. OTHER HAZARDOUS CHARACTERISTICS

1. Indicate by checking the appropriate box.
2. Indicate by checking the appropriate box. If "YES," indicate the concentration in PART E.
3. Indicate if this waste is any of the following:
RCRA REACTIVE - As defined by 40CFR261.
WATER REACTIVE - Reacts violently with water to form toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment.



Chemical Waste Management, Inc.



EXPLOSIVE - Capable of detonation or explosive reaction if subjected to a strong initiating source or if heated under confinement, a Class A explosive (49CFR173.53), or a Class B explosive (49CFR173.88).

SHOCK SENSITIVE - Normally unstable and readily undergoes violent change without detonating.

PYROPHORIC - Will ignite spontaneously in air at or below 130°F (54.4°C) (49CFR173.115).

RADIOACTIVE - Any material, or combination of materials, that has a specific activity greater than 0.002 microcuries per gram (49CFR173.403).

ETIOLOGICAL - A viable microorganism or its toxin which causes or may cause human disease (49CFR173.386).

PESTICIDE MANUFACTURING WASTE - Waste resulting from the manufacture of pesticides or the potential precursors of pesticides.

OTHER - Indications of other hazardous characteristics must be included (e.g., autopolymerization, peroxide-forming).

NONE OF THE ABOVE - Check this box if it is applicable for this waste.

PART H

Complete **ONLY** for wastes intended for fuels or incineration. If present, indicate the concentration as appropriate. If the concentrations of these constituents are unknown, please indicate "UNK" under "ACTUAL."

The following section lists parameters and suggested analytical methods that may be used in obtaining these values:

Parameter	Source
Beryllium, Potassium, Sodium	SW846-6010, 7090, 7610, 7770
Total Bromine, Chlorine, Fluorine	ASTM D2361-85, D4327-84, D808-81
Total Sulfur	ASTM D 2361-85, D516-82

PART I. OPTIONAL - RECLAMATION, FUELS OR INCINERATION PARAMETERS

Please provide this optional information where known. The following parameters and suggested analytical methods may be used in obtaining these values:

Parameters	Source
1. Heat Value (BTU/lb)	ASTM D 240-85, D2015-85
2. Percent Water	ASTM D 4006-81, E203-75
3. Viscosity	Any method
4. Percent Ash	ASTM D 482-80
5. Settleable Solids	Any method
6. Vapor Pressure	Any method
7. Indicate if this waste can be transferred by pumping at an ambient temperature of 50°F. If "YES," list the type of pump required (centrifugal, gear, peristaltic, etc.).	
8. Indicate if an external source of heat can be safely used to improve the flow of this waste.	
9. Indicate if this waste is soluble in water.	
10. PARTICLE SIZE - If the waste contains any solids, indicate if they can pass through a 1/8" screen.	

PART J. TRANSPORTATION INFORMATION

1. Indicate if this waste is a USDOT Hazardous material (49CFR172.101).
2. Anticipated Annual Volume/Units - Enter the amount of this waste which will be generated and transported annually. Use appropriate units to describe this volume (e.g., cubic yards, gallons, kilograms, pounds).
3. Proper Shipping Name - Enter the proper USDOT shipping name for this waste (49CFR172.101).
4. Hazard Class - Enter the proper USDOT hazard class (49CFR172.101).
5. I.D. # - Enter the proper USDOT Identification Number (49CFR172.101).
6. Additional Description - Enter any additional shipping information required (49CFR172.203) (e.g., "RQ", the names of Hazardous Substance Constituents as they would appear on the Uniform Hazardous Waste Manifest and the packaging).
7. Method of Shipment - Indicate the anticipated method(s) of shipment by checking the appropriate box(es). If drums are to be used, see 49CFR173 for DOT drum specifications.
8. CERCLA Reportable Quantity (RQ) - Enter the Reportable Quantity for this waste from 49CFR172.101 or 40CFR302.
9. RQ Units (lb/kg) - Indicate the appropriate units for the RQ listed in #8.
10. USEPA Hazardous Waste - Indicate if this waste is a USEPA Hazardous Waste (40CFR261).
11. USEPA Hazardous Waste Number(s) - If the answer to question #10 was "YES," then enter the appropriate USEPA Hazardous Waste Number(s) (e.g., D002, F002, K028, P006, U220) (40CFR261).
12. State Hazardous Waste - Indicate if this waste is a hazardous waste as defined by the state in which it is now located.
13. State Hazardous Waste Number(s) - If the answer to question #12 was "YES," then enter the appropriate State Hazardous Waste Number(s) (e.g., for a waste now in California: 212, 213).

PART K. SPECIAL HANDLING INFORMATION

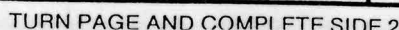
Describe those hazards which you know or reasonably believe are or may be associated with short term or prolonged human exposure to this waste (29CFR1910.1200). If known, please identify any carcinogens present in this waste in excess of 0.1% (29CFR1910.1200 (d)(4)). Attach relevant documents as a part of your response if appropriate. If documents are attached, identify those attachments. If you have a current Material Safety Data Sheet, it may be attached. Failure to make an entry in PART K is considered to be a representation that you neither know nor believe that there are any adverse human health effects associated with exposure to this waste.

Also include in PART K any additional information that will aid in the management of the waste (e.g., protective clothing, transportation, treatment, storage, disposal).

PART L. GENERATOR CERTIFICATION

An authorized employee of the generator must sign and date this certification on the completed Generator's Waste Material Profile Sheet.

MAKE A COPY OF THIS GENERATOR'S WASTE MATERIAL PROFILE SHEET FOR YOUR RECORDS. SEND THE ORIGINAL AND ATTACHMENTS TO THE ADDRESS SHOWN ON THE FRONT OF THIS WORK SET OR TO THE ADDRESS PROVIDED BY YOUR CHEMICAL WASTE MANAGEMENT, INC. SALES REPRESENTATIVE.



GENERATOR'S WASTE MATERIAL PROFILE SHEET (Continued)

J 34900

Waste Profile Sheet Code

G. OTHER HAZARDOUS CHARACTERISTICS

1. Is this waste a listed solvent waste as defined by 40 CFR 261.31 (F001, F002, F003, F004, or F005)? ☐ Yes ☐ No
2. Does this waste contain greater than 1000 ppm total halogenated organic compounds? ☐ Yes ☐ No
3. Indicate if this waste is any of the following:
 - ☐ RCRA Reactive ☐ Radioactive
 - ☐ Water Reactive ☐ Etiological
 - ☐ Explosive ☐ Pesticide Manufacturing Waste
 - ☐ Shock Sensitive ☐ Other _____
 - ☐ Pyrophoric ☐ None of the above

H. COMPLETE ONLY FOR WASTES INTENDED FOR FUELS or INCINERATION

	LESS THAN	or	ACTUAL
Beryllium	<input type="checkbox"/> < 5000 ppm		_____ ppm
Potassium	<input type="checkbox"/> < 5000 ppm		_____ ppm
Sodium	<input type="checkbox"/> < 5000 ppm		_____ ppm
Total Bromine	<input type="checkbox"/> < 2 %		_____ %
Total Chlorine	<input type="checkbox"/> < 35 %		_____ %
Total Fluorine	<input type="checkbox"/> < 1 %		_____ %
Total Sulfur			_____ %

I. OPTIONAL — RECLAMATION, FUELS, OR INCINERATION PARAMETERS Provide if information is available.

- Range
1. Heat Value (BTU/lb): _____
 2. Water: _____ %
 3. Viscosity (cps): _____ @ ☐ _____ °F ☐ 100°F ☐ 150°F
 4. Ash: _____ %
 5. Settleable solids: _____ %
 6. Vapor Pressure @ STP (mm/Hg): _____
 7. Is this waste a pumpable liquid? ☐ Yes ☐ No
Type of pump? _____
 8. Can this waste be heated to improve flow? ☐ Yes ☐ No
 9. Is this waste soluble in water? ☐ Yes ☐ No
 10. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? ☐ Yes ☐ No

J. TRANSPORTATION INFORMATION

1. Is this a DOT Hazardous Material? ☐ Yes ☐ No
2. Anticipated Annual Volume/Units: _____ /
3. Proper Shipping Name: _____
4. Hazard Class: _____
5. I.D. #: _____
6. Additional Description: (_____)
7. Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solid ☐ Drum (Type/Size): _____ / _____ Other: _____
8. CERCLA Reportable Quantity (RQ): _____
9. RQ Units (lb/kg): _____
10. USEPA Hazardous Waste? ☐ Yes ☐ No
11. USEPA Hazardous Waste Number(s): _____
12. State Hazardous Waste? ☐ Yes ☐ No
13. State Hazardous Waste Number(s): _____

K. SPECIAL HANDLING INFORMATION

☐ Additional Page(s) Attached

L. GENERATOR CERTIFICATION I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste material, and all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

1. _____
Signature
2. _____
Title
3. _____
Name (Type or Print)
4. _____
Date



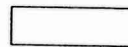
Chemical Waste Management, Inc.

GENERATOR'S CERTIFICATION OF REPRESENTATIVE SAMPLE

PLEASE PRINT IN INK OR TYPE (Elite, 12-pitch).



J34900



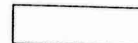
J 34900

Waste Profile Sheet Code

CWM Location of Original: _____

(SHADED AREAS FOR CWM USE ONLY)

CWM Sales Rep. #: _____



This completed form must be returned, with the representative sample, to:

INSTRUCTIONS FOR COMPLETING THIS FORM ARE FOUND ON THE OPPOSITE SIDE. In order to determine whether Chemical Waste Management, Inc. can accept the special waste described in the Generator's Waste Material Profile Sheet referenced above, you must obtain and supply us with a representative sample of the waste. We may analyze the sample to verify the information that you have provided to us. A representative sample is defined as a sample obtained using any of the applicable sampling methods specified in 40 CFR 261-Appendix I or an equivalent method. Collect a representative sample of your waste and complete the form below. Apply the peel off label and ship your sample along with this form to the address noted above. If you have any questions regarding obtaining a representative sample of your waste, please refer to the instructions for this form, or contact your Chemical Waste Management, Inc. sales representative.

A. SAMPLING METHOD (Indicate which method was employed)

If sampling requirement has been waived by Chemical Waste Management, Inc., do not complete this Generator's Certification of Representative Sample form.

1. ☐ I have obtained a representative sample of the waste material described in the Generator's Waste Material Profile Sheet referenced above according to the sampling methods specified in 40 CFR 261-Appendix I.
2. ☐ I have obtained a representative sample of the waste material described in the Generator's Waste Material Profile Sheet referenced above using a method equivalent to the sampling methods described in 40 CFR 261-Appendix I.

B. SAMPLE SOURCE (e.g., drum, lagoon, pit, pond, tank, vat)

C. SAMPLE LABEL — COMPLETE LABEL BEFORE REMOVING



J34900

- | | |
|------------------------------------|------------------------------------|
| 1. Waste Profile Sheet Code: _____ | 1. Waste Profile Sheet Code: _____ |
| 2. Generator's Name: _____ | 2. Generator's Name: _____ |
| 3. Name of Waste: _____ | 3. Name of Waste: _____ |
| 4. Sample Hour/Date: _____ | 4. Sample Hour/Date: _____ |
| 5. Sampler's Signature: _____ | 5. Sampler's Signature: _____ |

6. Print Sampler's Name: _____

7. Sampler's Title: _____

8. Sampler's Employer (if CWM, see D. below): _____

D. WITNESS VERIFICATION (if required) In most circumstances you will be obtaining the sample. However, in those cases in which Chemical Waste Management, Inc. obtains the sample, one of your employees must be present to direct the particular source to be sampled, to witness the sampling, and to complete this Part D.

I was personally present during the sampling described. I directed the waste source to be sampled, and I verify the information noted above.

1. Witness' Signature: _____

2. Witness' Name: _____

3. Witness' Title: _____

4. Witness' Employer: _____



Chemical Waste Management, Inc.

GENERATOR'S CERTIFICATION OF REPRESENTATIVE SAMPLE



Shaded areas are for CWM use only.

PART A. SAMPLING METHOD

Questions concerning sample waiver should be referred to your Chemical Waste Management, Inc. Sales Representative. Check the sampling method employed.

This sample should be collected in accordance with "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods", SW846, USEPA, Office of Solid Waste, Washington, D.C. 20460 and/or 40CFR261-Appendix I. A suitable sample container for most wastes is a wide mouth glass bottle with a plastic cap having a non-reactive liner. Plastic containers are recommended for strong caustics or fluorides. Fill to approximately 90% of capacity to allow for expansion during transportation. The peel off label on this form must be completed prior to removal from the form. Ultimately, the label must be attached to the sample container, not the shipping container.

If this waste is a hazardous material, the sample must be packaged and shipped in accordance with USDOT regulations (49CFR171.2) and any specific requirements imposed by the carrier. Improperly packaged samples may be disposed of upon receipt.

PART B. SAMPLE SOURCE

The sampler is to describe exactly from where the sample was taken (e.g. conveyor, drum, lagoon, pipe, pit, pond, tank, vat).

PART C. SAMPLE LABEL

THE SAMPLE LABEL MUST BE COMPLETED BEFORE IT IS REMOVED FROM THIS FORM

Apply the completed peel off label to the container which actually holds the sample - not to the shipping carton. DO NOT WRITE ON THE BAR CODE (if present).

1. WASTE PROFILE SHEET CODE - If not preprinted, enter the appropriate Waste Profile Sheet Code. This Certification and its peel off label must be used to identify **ONLY** the sample of the waste described in the Generator's Waste Material Profile Sheet bearing the same Waste Profile Sheet Code.
2. GENERATOR'S NAME - Enter the name of the generating facility.
3. NAME OF WASTE - Enter a name which is generally descriptive of this waste (e.g., cyanide plating waste, paint sludge, PCB contaminated dirt, still bottoms, wastewater treatment sludge) as it appears on the Generator's Waste Material Profile Sheet.
4. SAMPLE HOUR/DATE - Enter the hour and date sample was collected.
5. SAMPLER'S SIGNATURE - The sampler must sign in the space provided.
6. PRINT SAMPLER'S NAME - Enter the sampler's name.
7. SAMPLER'S TITLE - Enter the sampler's title.
8. SAMPLER'S EMPLOYER (If CWM, See D. Below) - Enter the sampler's employer's name.

Remove the completed peel off label and affix it to the sample container at the time of sampling. If this label is lost or destroyed, the sample must be labeled with equivalent information, including the Waste Profile Sheet Code. If the Certification of Representative Sample Form is lost or destroyed, please contact your Chemical Waste Management, Inc. Sales Representative to obtain a new one.

PART D. WITNESS VERIFICATION (if required):

In the event that a Chemical Waste Management, Inc. employee obtains the sample on your site, one of your employees must be present to direct our employee to the sample source and to witness the sampling. Your employee must also provide the information requested in this PART D.

1. WITNESS' SIGNATURE - Sign in the space provided.
2. WITNESS' NAME - Print the name of the person who witnessed the sampling.
3. WITNESS' TITLE - Enter the witness' title.
4. WITNESS' EMPLOYER - Enter the witness' employer's name.
5. DATE - Enter the date the sampling event was witnessed.

SCA CHEMICAL SERVICES



ILLINOIS GENERATOR I.D. NUMBER

EACH WASTE PRODUCT APPROVED BY SCA WILL BE CLASSIFIED UNDER ONE OF OUR GENERIC PERMIT NUMBERS. FOR THIS REASON, IT IS IMPORTANT THAN AN ILLINOIS GENERATOR I.D. NUMBER BE OBTAINED. IN ADDITION, WHEN SHIPPING WASTE TO SCA, YOU WILL REQUIRE AN ILLINOIS HAZARDOUS WASTE MANIFEST. IN ORDER TO OBTAIN MANIFESTS FROM THE STATE, YOU MUST HAVE AN I.D. NUMBER. SCA CHEMICAL SERVICES CANNOT PROVIDE MANIFESTS.

**INSTRUCTIONS FOR COMPLETING
ILLINOIS GENERATOR I.D. NUMBER REQUEST FORM**

Generator I.D. numbers are normally assigned from data provided in Supplemental Waste Stream Permit Applications submitted by permitted treatment, storage or disposal sites. Generator I.D. numbers are automatically assigned to those generators who do not have one when waste stream permit applications are received. This form is to be used by those generators that ship all of their waste out-of-state or only to Illinois TSD facilities having a generic permit to accept the generator's waste stream.

Please TYPE or PRINT LEGIBLY in ink. INCOMPLETE FORMS WILL BE REJECTED.

COMPLETING THE FORM

List the name, company and telephone number of the person requesting the generator number.

Indicate the generator's official business name, location (P.O. box numbers are not acceptable), city, state, zip code, county, mailing address (if applicable), contact person, and business phone.

Frequency of Transportation - this information is needed in order to determine how many manifest forms will be needed. Please check one.

Provide the waste destination (TSD facility) name, address, and generic permit authorization number or Illinois site code # (out-of-state facilities only). This information is available from the TSD facility.

Sign and date the Authorization Statement and return this form to the Illinois Environmental Protection Agency.

This form will be returned to the generator via UPS delivery when a generator number has been assigned. A supply of manifests and a manifest order form will be enclosed for the generator's use.

GENERAL INFORMATION

It will take approximately three (3) weeks to process your generator number request. Please schedule waste shipments after the expected receipt date of your generator number package.

Generator numbers will be assigned only on receipt of this request form. Telephone requests will not be accepted. Requests for information on numbers previously assigned must be submitted, in writing, to the Permit Section.

Questions regarding completion of this form may be directed to Carrie Agrall at 217/782-6762.

CLA:tk:5/8/46-2(3/17/83)

This Agency is authorized to release this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is requested under that Section. Failure to do so may result in the information being withheld and could result in your information being removed from this form. This form is not to be used for any other purpose.



ILLINOIS GENERATOR I.D. NUMBER REQUEST FORM

This form supersedes all previous editions. Effective May 1, 1988 all requests not submitted on this form will be rejected. See reverse side for instructions for completing this form.

This number is being requested by _____
of (Company) _____ PHONE _____

GENERATOR NAME _____

LOCATION (Not P.O. Box) _____

CITY, STATE & ZIP CODE _____ COUNTY _____

MAILING ADDRESS (if different than above) _____

CITY, STATE & ZIP CODE _____

CONTACT PERSON _____ PHONE _____

FREQUENCY OF TRANSPORTATION (check one).

☐ 1 = one time only ☐ 3 = weekly ☐ 5 = monthly ☐ 7 = quarterly
☐ 2 = daily ☐ 4 = bi-weekly ☐ 6 = bi-monthly ☐ 8 = semi-annual

WASTE DESTINATION (TSD Facility) _____

ADDRESS _____

CITY, STATE & ZIP CODE _____

*

*Indicate TSD's Illinois Site Code Number (if Out-of-State) or Generic Permit Authorization Number (of Illinois TSD Facility) (MUST BE COMPLETED).

AUTHORIZATION STATEMENT

I authorize this request for assignment of an Illinois generator number. This company has not previously shipped waste under the Illinois Manifest System. If my waste is a RCRA hazardous waste, I certify this company has a USEPA generator I.D. number.

Signature of Generator: _____

Title: _____ (Owner or Operator)
Date: _____

Return this form to: Illinois Environmental Protection Agency
Division of Land Pollution Control (#24)
Permit Section
2200 Churchill Road
P. O. Box 19276
Springfield, IL 62794-9276

FOR AGENCY USE ONLY

GENERATOR I.D. # _____

EDP _____
Region _____
IMES/Manifest _____
File _____

ADDENDUM

Dated: August, 1988

This sets forth Fisher Guide's response to the Department's Technical Notice of Incompleteness, which was forwarded under cover of Paul Counterman's letter of July 15, 1988.

1.2 PROJECT OBJECTIVES

✓ Comment

Applicant must not only provide an average for PCB concentrations at Meadowbrook, but also the highest and lowest values.

Response

This information is set forth in O'Brien & Gere's September, 1987 Report entitled "Risk Assessment Meadowbrook/Hookway Ley Creek Sediment Deposit Area." The report has been previously provided to the Department and this was confirmed at Fisher Guide's December 21, 1987 meeting with Paul Counterman and representatives of his staff in Albany. However, as a courtesy, we have attached as Exhibit A two sketches of the Meadowbrook area which gives the sample locations and the reported PCB concentrations.

✓ 2.1 WASTE INVENTORY

Comment

The statement that claims all waste will be disposed of at SCA/Chemical Waste Managements landfill cannot be made as

there has been no acceptable characterization of the sludges to date.

Response

In accordance with the discussion at the Albany technical meeting in March of 1988, the sediments from the impoundments were re-characterized. Attached as Exhibit B is a copy of the analytical report and a sketch of the impoundments, showing sampling locations. The testing results showed PCB contamination in excess of 500 ppm (wet weight) in Impoundment #1. Disposal options in light of these results are being evaluated and will be reviewed with NYDEC at a meeting to be held after Labor Day.

Fisher Guide will perform any additional characterization of the sediments which is required by the hazardous waste management facilities involved. Attached as Exhibit C is a copy of a typical waste characterization form which will need to be completed by Fisher Guide for the disposal facilities being considered for handling the PCB wastes at this site.

2.2.1 RUN-ON AND RUN-OFF CONTROL

Comment

Describe the method for minimizing run-on and run-off of the stockpiled Meadowbrook soils.

Response

During impoundment closure operations, Fisher Guide will make every effort to schedule Meadowbrook soil deliveries so

that the soils can be immediately placed into the excavated impoundments upon arrival at the site.

Should stockpiling nevertheless occur, it will be for only a few days at most and a plastic cover with tie-downs will be placed on the pile. Furthermore, the stockpile will be situated directly adjacent to Impoundment #1 and any runoff will be directed into the impoundment by a shallow swale around the pile. Any runoff produced would not be any more hazardous than the Meadowbrook soils to be placed into the impoundment. In this case, the impoundment will serve as an effective catch basin.

2.2.2 DUST AND PARTICULATE CONTROL

Comment

Describe the moisture control measures to be implemented to avoid nuisance dust and airborne particulate matter.

Response

A water supply source will be maintained on site to control nuisance dust. A water hose with a pressure nozzle will be used to sprinkle temporary work areas, Meadowbrook soils during placement and the fill soils.

The impoundment sediments should not be overly dry during closure, but a hose will be used to control particulates, if necessary. Since placement of the Meadowbrook soils will only take a few days, fugitive dust from this phase of the work should be a minor concern. Fill soils will also be moisture-controlled during placement, not only to minimize dust, but also to meet compaction specifications.

2.3.1 OVERVIEW

Comment

This section states that all contaminated materials will be disposed of in a TSCA approved landfill. It should be added that material may need to be incinerated pending characterization of the waste.

Response

See Response to 2.1

2.3.2 REMOVAL/TREATMENT OF SUPERNATANT

Comment

Applicant must describe the manner in which the supernatant will be stored while awaiting the laboratory results to determine if pretreatment is necessary. What are the pretreatment criteria? What is the lab turn around time?

Response

During the July, 1988 recharacterization program, three (3) samples were taken of impoundment supernatant and analyzed for PCBs at a New York-certified laboratory. Two samples were duplicates from Impoundment #1, and the third from the smaller Impoundment #2. An average of 7.05 ug/l of Aroclor 1242 was detected in these samples (4.2/16 ug/l - Impoundment #1 and .95 ug/l - Impoundment #2); Aroclor 1242 was the only PCB detected. The discharge limit for PCBs in Fisher Guide's POTW permit is 2.0 ug/l for total PCBs (Aroclors) as defined by U.S. EPA Method 608.

As part of the closure operations, all supernatant waters will be pretreated in a portable carbon filtration unit to be located next to the impoundments. Supernatant will first be pumped to a settling tank to remove coarse solids. From the tank, the water will go through portable activated carbon columns to remove PCBs. Supernatant will then be directed to portable batch tanks for sampling. These tanks may be one-piece molded units or formed units with a flexible membrane line. When each batch unit is filled, a sample will be taken and analyzed for PCBs at a local laboratory which has been certified by the Department.

Pending favorable results from the laboratory, each batch tank will be pumped to Fisher Guide's on-site wastewater treatment plant ("WWTP") for more treatment prior to discharge to the Onondaga County POTW. The Fisher Guide WWTP also includes a carbon filtration unit. However, the capacity of that system is limited, and the carbon unit may not be available for supernatant and decontamination water treatment at the on-site WWTP during closure operations.

To facilitate continuous treatment of supernatant, at least two batch tanks will be used to store treated water prior to discharge to the on-site WWTP. Samples will be analyzed with a 24-hour turn-around time at a locally certified laboratory.

2.3.4 IMPOUNDMENT STRUCTURES DISMANTLING,
DECONTAMINATION AND/OR DISPOSAL

Comment

Concrete and wood, being porous, are difficult to thoroughly decontaminate. If decontamination is attempted, then surface samples of both the wood and concrete will be required to be sampled. Otherwise they must be disposed of as hazardous waste. Wipe tests should be taken of the metal structures in addition to washwater analyses.

Response

Impacted concrete and wood will not be decontaminated but disposed as hazardous waste. Washwater analysis will be performed to ensure that discharge standards are met.

2.3.5 BACKFILLING, GRADING, AND LANDSCAPING,
IMPOUNDMENT NO. 2

The applicant is required to provide justification for not placing a cap on this unit. Under RCRA, this impoundment will not be considered "clean closed" until the soil levels meet or fall below the health-based standards for all the contaminants of concern. If the applicant encounters groundwater, yet has not met the health-based standard some type of cap might still be considered appropriate unless the applicant can show that the volatilization of any constituents is negligible.

Response

Fisher Guide will perform verification soil sampling and analysis for Impoundment #2. If the clean standards are not

achieved before encountering groundwater, an impermeable cap will be installed. The design and construction of the cap will be similar to that of Impoundment #1.

2.3.6 DESIGN AND CONSTRUCTION OF MEADOWBROOK PLACEMENT AREA

Comment

This section must state that all modeling data or subsoil characteristics used as a basis for design of the placement area (i.e., cap) must be approved by NYSDEC;

The cap permeability must be less than 10^{-7} cm/sec, not 10^{-6} cm/sec;

The last paragraph should read, ". . . impact of the proposed project and not affect post closure care."

Response

All modeling data used in the Hydrologic Evaluation of Landfill Performance (HELP) model will be provided to NYDEC. This includes climatological data, soil and waste characteristics, and other input values.

The impermeable cap will exhibit a vertical hydraulic conductivity of 10^{-7} cm/sec or less.

With respect to the comment directed to the last paragraph of this section, Fisher Guide generally concurs with the Department and proposes that the referenced sentence in the plan read as follows: ". . . GMC Fisher Guide satisfies the concerns of NYDEC with respect to potential environmental impact of the proposed project, including impacts on post-closure care."

2.4 VERIFICATION SOIL SAMPLING AND ANALYSIS PLAN

Comment

All parameters of interest in this area must be tested for in the soil. In addition to PCBs and chromium, volatiles and metals should be run;

The analyses for the metals should be EP Tox as well as Totals;

As a point of clarification, GMC will be required to sample for Appendix IX constituents beneath the impoundments after all soil verification samples have come back clean. The depth of the Appendix IX samples shall be one foot in depth. This information will be used as part of a database on which to develop a post-closure monitoring network.

Response

In the early drafts of the closure plan, Fisher Guide selected PCBs and chromium as its closure standard parameters based on known waste characteristics and this is the first time NYDEC has commented on the selection of these parameters. They are reasonable indicators of the extent of contamination and NYDEC has not explained why the presence of volatiles and metals should now be evaluated.

The closure plan already states Fisher Guide's willingness to sample for Appendix IX constituents. With respect to the depth of the samples, the plan was previously modified to reflect

NYDEC's January, 1988 comment to increase the depth from 4 to 6 inches. If desired, Fisher Guide is willing to modify the depth a second time to one foot.

2.4.2 LABORATORY ANALYSIS

Comment

A New York State technically acceptable laboratory must be used.

The NYSDEC reserves the right to not accept any data from analyses performed by laboratories that do not meet the NYSDEC "technically acceptable" standards.

Response

A NYDEC technically acceptable laboratory will be used for analysis.

2.7 HEALTH AND SAFETY

Comment

The Site Safety Plan (SSP) must be approved by NYSDEC and in place before any on-site work begins. In the applicant's cover letter, it is stated that portions of the work will begin prior to regulatory approval. Therefore, it is unacceptable for the Site Safety Plan to be prepared by the closure contractor following closure plan approval and prior to closure;

It is assumed that the 3 zones will be fully described in the SSP, as well as the levels of protection to be required at this site;

Describe fully the method for preventing volatilization of the PCBs during closure;

The SSP must present levels to be used in determining when safety monitoring is needed and what steps will be taken if safe levels are exceeded.

Response

No construction activities will take place before approval of the Site Safety Plan. The work items mentioned in the cover letter were preconstruction activities only. No activities have been or will be attempted which would require an in-place construction Site Safety Plan, without approval of the SSP by NYDEC.

The three zones will be delineated in the SSP. Levels of protection required for each zone, and the criteria that will be used to upgrade the level of protection in the work zone will be fully described in the SSP.

Particulate sampling for PCBs will be conducted at the site to provide safety monitoring.

The SSP will define safe levels and the steps to be taken if they are exceeded. Volatilization of the PCBs should not be a problem at this site. PCBs are virtually nonvolatile in the absorbed state. Considering the tendency for PCBs to preferentially partition into the organic phase of soils, little or no volatilization should occur during closure operations.

Particulate sampling will be more relevant to health and safety concerns.

2.10 POST-CLOSURE PLAN

Comment

Amend the second paragraph to state that post-closure care and monitoring shall continue until the post-closure permit is issued.

Response

The plan will confirm that the post-closure care described in the plan will continue until the post-closure permit is issued. However, Fisher Guide expects the post-closure permit will be issued following the completion of the construction closure activities.

Appendix C - PRECONSTRUCTION ACTIVITY

Comment

OK,
Sediment samples for recharacterization should also be analyzed for metals and volatiles. If these are not found in the sludge, then it will not be necessary to analyze for them in the soil verification phase;

Under "Evaluation of Construction Materials" it should note that all data compiled to evaluate design suitability must be reviewed and approved by NYSDEC.

Response

As to the first comment, see Response to 2.1. With respect to the second comment, all data used to confirm the

suitability of construction materials will be provided to NYDEC for its review and approval.

Appendix E: POST CLOSURE GROUND WATER MONITORING PLAN

2.01 WELL LOCATIONS

Comment.

The maximum screen length that will be used in a single monitoring well installation must be stated. NYSDEC recommends a screen length of no more than ten feet.

Response.

Section 2.01 of the work plan will be modified to insert the following:

"Monitoring well screen lengths will be selected dependent upon site specific geologic conditions noted at each well location. If the aquifer thickness at a given location is determined to be less than 15 feet, a single monitoring well will be installed and screened with a 10 foot section of stainless steel well screen extending from the ground water interface to the top of the till layer. In areas where the aquifer exceeds 15 feet in thickness, a nested pair of wells will be installed consisting of a shallow well screened at the water table interface and a deeper well screened immediately above the aquifer/till interface. These wells will be fitted with 5 foot sections of stainless steel well screen."

Comment.

Soil samples should also be taken continuously and sampled for PCBs, volatiles and metals.

Response.

Continuous soil samples from the well borings for analysis of PCBs, volatiles and metals were never requested in the Department's comment letters on the two prior drafts of the closure plan. Nor were they requested at the technical meeting held in Albany in March of 1988. Because the wells will be installed outside the impoundments, this sampling does not provide any technical data pertinent to the closure. The work is unnecessary and has no regulatory basis.

2.03 ANALYTICAL REQUIREMENTS

Comment.

The entire scans should be run on the initial round of sampling (semivolatiles, BNAs and metals). Volatiles should be run on all RCRA wells during the accelerated program to rule out their presence.

Response.

DEC has previously requested that the entire scan (which includes acid extractable and base neutral analysis) be performed on all wells. However, previous analyses for priority pollutants at the site does not justify this comprehensive analytical program. As a compromise, it was agreed at the Albany technical meeting

that Appendix IX analyses would be performed on two wells initially with subsequent analysis on all wells limited to those Appendix IX parameters detected in the initial round.

Comment.

The upgradient well is not a compliance point well; it is a well used for comparison purposes to a compliance point well. 6 NYCRR 373-2.6(f) describes the point of compliance more fully.

Response.

Section 2.03 of the work plan will be revised to delete the second last sentence of the paragraph and insert the following: "In addition, during the initial sampling event, one designated upgradient monitoring well and one downgradient compliance monitoring well will be sampled for Appendix IX constituents as identified in 6 NYCRR Part 371."

2.04 MONITORING FREQUENCY

Comment.

The entire RCRA Monitoring well network is to be sampled on the accelerated program, not just the compliance well and the upgradient well. Samples will be analyzed for the site specific parameters listed in Section 2.03, plus volatiles, plus any parameters found in Appendix IX analyses.

Response.

This monitoring frequency/analytical requirement for the accelerated monitoring program is not justified from previous analyses. Fisher Guide understood from previous negotiations that

the proposed sampling set forth in the closure plan of one upgradient and one compliance well for detailed analyses was satisfactory.

Comment.

Following the accelerated 6 month program, all the wells shall be sampled quarterly until the post-closure permit is issued.

Response.

Following the accelerated sampling program, all newly installed RCRA wells will be sampled on a quarterly basis until the post-closure permit is issued. This is in accordance with the current draft of the closure plan.

3.02 SAMPLE PRESERVATION AND SHIPMENT

Comment.

Metals analysis for the RCRA program must be total metals. Fisher [Guide] may analyze total and soluble metals until sufficient data is generated that justifies using soluble metals.

The unfiltered samples to be analyzed for metals must also be preserved to a pH of less than 2 in the field.

Response.

These comments are addressed in Section 3.02 of Appendix E of the current draft of the closure plan. Priority pollutant metals analyses are to be for total metals. All samples filtered and unfiltered collected for metals analyses will be preserved to a pH of less than 2 in the field.

4.01 GROUND WATER ELEVATION ASSESSMENT

Comment.

Groundwater elevations collected during the accelerated monitoring program must also be summarized on a data base table.

Response.

A complete round of ground water elevations will be collected during each sampling event including the accelerated and quarterly sampling events. These data will be reduced to datum and summarized on a data base table. This requirement was implicit in the current draft of the closure plan.

4.02 GROUND WATER QUALITY ASSESSMENT

Comment.

Replicates must be run on all parameters for those wells that will be used for statistical analysis. This includes the downgradient compliance point well and the upgradient wells.

Response.

Section 4.04 of Appendix E clearly states that replicate samples will be collected in the designated upgradient well and downgradient compliance point well. These samples will be analyzed for elevated constituent parameters identified by the Appendix IX analyses.

4.03 REPORT SUBMITTALS

Comment.

Explain why data from the first and third quarters will not be used to prepare the annual report. 6 NYCRR 373.3 requires

that an annual report be submitted by March 1 of the following year, until a Post-Closure permit is issued.

Response.

It was always intended to submit all data collected during the year. The clarification will be made.

MONITORING WELL INSTALLATION PROTOCOL (Post-Closure Groundwater Monitoring - Appendix B)

I. Drilling and Sampling Procedures

Comment.

Describe how the drilling rig and equipment will be decontaminated. Continuous samples shall be taken and analyzed. List what will each sample be analyzed for and the appropriate containers for each.

Response.

It was intended that the drilling and associated equipment which come into contact with potentially contaminated materials will be cleaned on-site with a portable pressurized steam cleaner.

The purpose of the post-closure monitoring program is to assess ground water quality upgradient and downgradient of the surface impoundments, not to define subsurface soil conditions. Consequently, the proposed analyses of soil samples is not acceptable. This comment was never mentioned by NYDEC following review of the earlier drafts of the closure plan or at the Albany technical meeting.

II. Monitoring Well Completion

Comment.

Further details must be provided on the well completion data, such as: length of screen, length of sand pack, protective apron etc. Provide a typical illustration.

Response.

The monitoring well details are described in Section 2.02 and Appendix B of the post-closure groundwater monitoring plan. However, a typical illustration can be provided and a more detailed description can be included such as the following:

Screen lengths for each monitoring well will have a maximum length of 10 feet, sand packs will consist of an appropriate sized, graded aggregate, (preferably Q-Rock-4). The sand pack will extend a minimum of two feet above the top of the well screen. Subsequent to grouting, an outward sloping concrete apron will be installed around the protective casing to insure that runoff will proceed away from the well head.

All monitoring wells will be developed or cleared of all fine grained materials and sediments that have settled in or around the well during installation to insure the screen is transmitting representative portions of the ground water. The development will be by one of three methods, air surging, pumping, or bailing ground water from the well until it yields

relatively sediment-free water. The determination of which method to use is dependent upon the size and depth of well and the volume of ground water in the well.

The air surging method of development consists of extending a clean propylene tube down into the screened portion of the well. This tube is attached to an air compressor. The compressed air displaced the water and suspended fine grained material from the well. The well is allowed to surge until the ground water clears. For either the pumping or bailing method, a decontaminated pump or bailer will be utilized and subsequently decontaminated after each use. Ground water will be pumped from the bottom of the well. Bailing will utilize a stainless steel bailer and new polypropylene rope. Pumping or bailing will cease when the ground water yields sediment-free water.

GROUND WATER SAMPLING PROCEDURES (Post-Closure Groundwater Monitoring - Appendix D)

Comment.

Bottom filling bailers must be used to take samples to avoid aeration of sample.

Total well depth must also be measured at the beginning of each sampling event.

Continue bailing until three volumes have been removed and the pH and specific conductivity have stabilized.

Explain how the purge water will be disposed.

Samples for volatile analysis must be taken no more than three hours after the completion of purging.

Measure the depth to water just prior to sampling to observe the recovery of the well.

Response.

NYDEC's comments regarding sampling were not included in the Department's comments on earlier drafts of the closure plan nor were they raised at the March, 1988 technical meeting in Albany. However, Fisher Guide is willing to address these comments as follows:

Materials

A bottom loading stainless steel bailer will be used to collect ground water samples.

Sampling Procedures Using a Bailer

The total depth of each well will be measured prior to initiating well evacuation.

Bailing will continue until 3 to 5 well volumes have been evacuated and/or pH and specific conductivity measurements exhibit reasonable stability.

Purged water will be containerized and transported to the on-site Waste Water Treatment facility for disposal.

Samples for volatile analysis will be collected within 3 hours of evacuation.

A ground water elevation measurement will be taken prior to sampling each well to observe the percent of recovery.

SOIL SAMPLE ANALYSIS RESULTS 0"-12" BELOW COVER MATERIAL

MEADOWBROOK SITE
FISHER GUIDE DIVISION
GENERAL MOTORS CORPORATION
SYRACUSE, NEW YORK

PRELIMINARY DATA
PENDING QA/QC REVIEW
REVISED 8/12/87

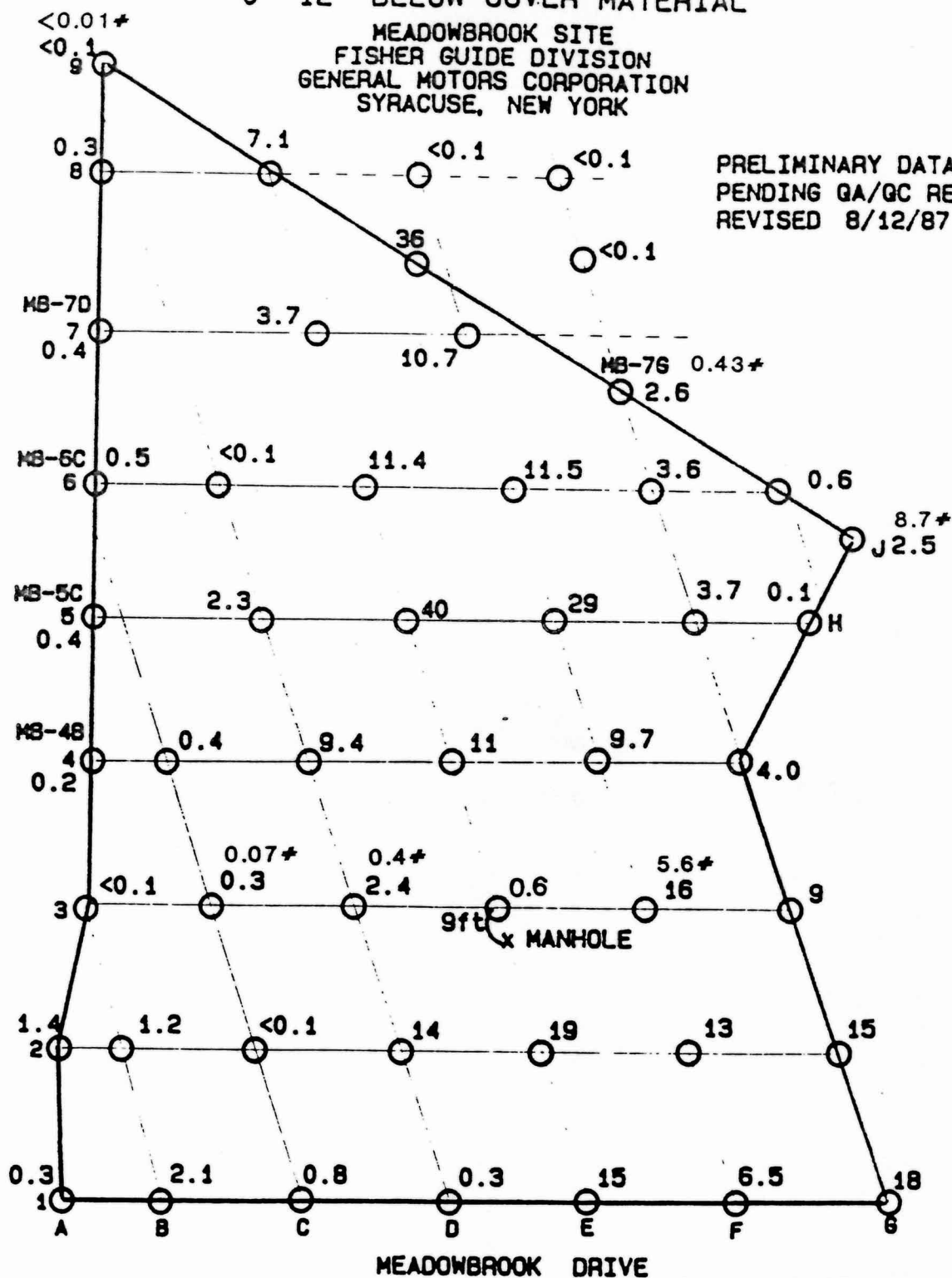
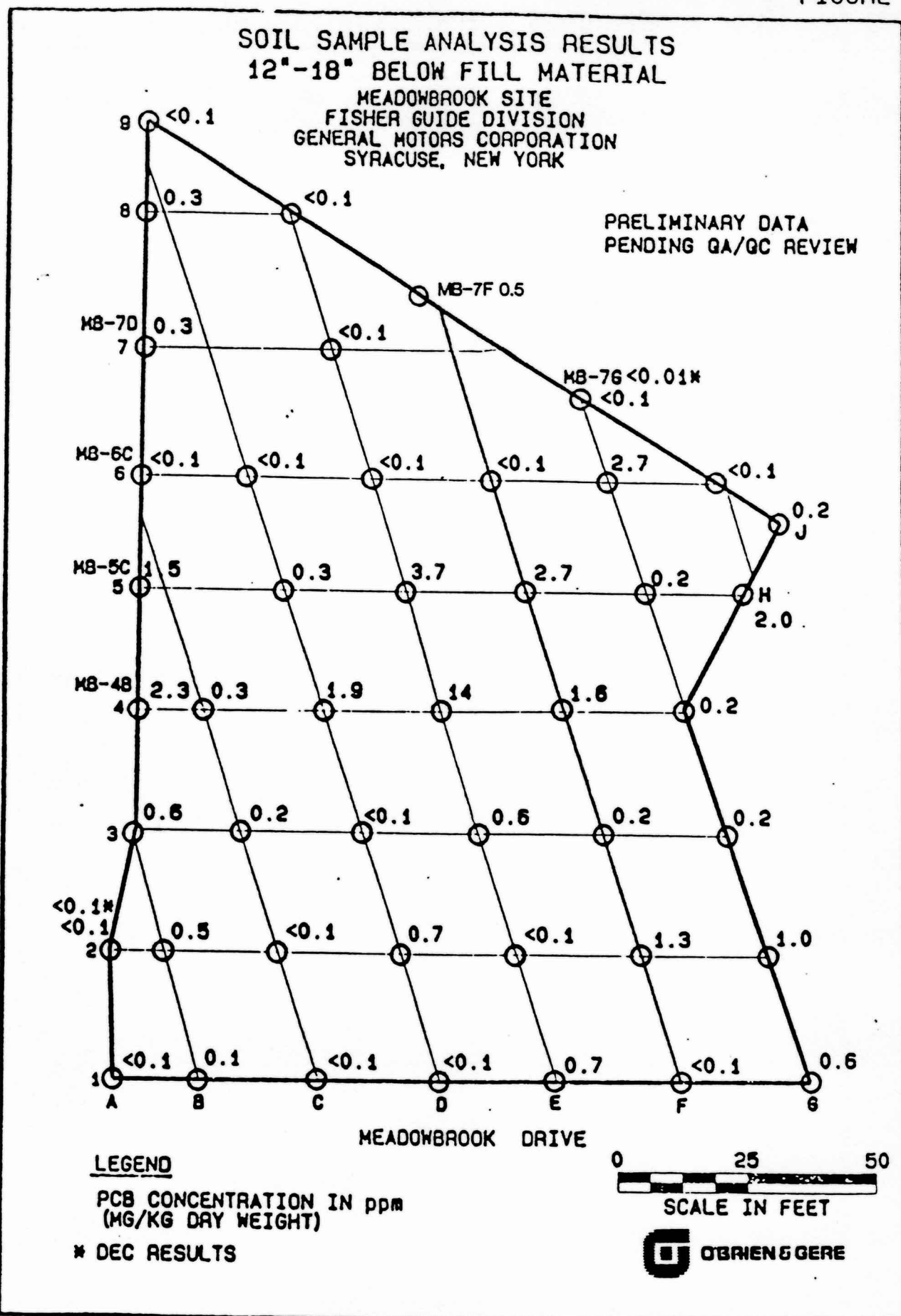


FIGURE 3



E. Dering

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233



Thomas C. Jorling
Commissioner

JUL 15 1988

*File this
could*

Mr. Richard Larkin
Manager Manufacturing Engineering
Fisher Guide Division
General Motors Corporation
1000 Town Line Road
Syracuse, NY 13221-4869

Dear Mr. Larkin:

Re: Technical Notice of Incomplete Application

The New York State Department of Environmental Conservation has reviewed the closure plan submitted May 16, 1988 for the facility's surface impoundments. As a result, the closure plan has been found to be incomplete. Please address the comments detailed on the attached pages in a revised closure plan. This plan will be due by August 20, 1988.

If you have any questions, please call Ms. Leslie Stephenson of my staff at (518) 457-9696.

Sincerely,

Steve Kaminski for PRC

Paul R. Counterman, P.E.
Director
Bureau of Hazardous Waste Facility
Permitting
Division of Hazardous Substances
Regulation

Enclosures

cc: S. Kaminski
E. Miles

~~M. Panek~~, Region II, EPA
T. Cullen, Region 4

E. Dering

Technical Notice of Incompleteness
GMC Fisher Guide Division
Surface Impoundment
Closure Plan

1.2 Project Objectives

- Applicant must not only provide an average for PCB concentrations at Meadowbrook, but also the highest and lowest values.

2.1 Waste Inventory

- The statement that claims all waste will be disposed of at SCA/Chemical Waste Managements landfill cannot be made as there has been no acceptable characterization of the sludges to date.

2.2.1 Run-on and Run-off Control

- Describe the method for minimizing run-on and run-off of the stockpiled Meadowbrook soils.

2.2.2 Dust and Particulate Control

- Describe the moisture control measures to be implemented to avoid nuisance dust and airborne particulate matter.

2.3.1 Overview

- This section states that all contaminated materials will be disposed of in a TSCA approved landfill. It should be added that material may need to be incinerated pending characterization of the waste.

2.3.2 Removal/Treatment of Supernatant

- Applicant must describe the manner in which the supernatant will be stored while awaiting the laboratory results to determine if pretreatment is necessary. What are the pretreatment criteria? What is the lab turn around time?

2.3.4 Impoundment Structures Dismantling, Decontamination and/or Disposal

- Concrete and wood, being porous, are difficult to thoroughly decontaminate. If decontamination is attempted, then surface samples of both the wood and concrete will be required to be sampled. Otherwise they must be disposed of as hazardous waste. Wipe tests should be taken of the metal structures in addition to washwater analyses.

2.3.5 Backfilling, Grading, and Landscaping, Impoundment No. 2

- The applicant is required to provide justification for not placing a cap on this unit. Under RCRA, this impoundment will

not be considered "clean closed" until the soil levels meet or fall below the health-based standards for all the contaminants of concern. If the applicant encounters groundwater, yet has not met the health-based standard some type of cap might still be considered appropriate unless the applicant can show that the volatilization of any constituents is negligible.

2.3.6 Design and Construction of Meadowbrook Placement Area

- This section must state that all modeling data or subsoil characteristics used as a basis for design of the placement area (i.e., cap) must be approved by NYSDEC.
- The cap permeability must be less than 10^{-7} cm/sec, not 10^{-6} cm/sec
- The last paragraph should read, "...impact of the proposed project and not affect post closure care."

2.4 Verification Soil Sampling and Analysis Plan

- All parameters of interest in this area must be tested for in the soil. In addition to PCBs and chromium, volatiles and metals should be run.
- The analyses for the metals should be EP Tox as well as Totals.
- As a point of clarification, GMC will be required to sample for Appendix IX constituents beneath the impoundments after all soil verification samples have come back clean. The depth of the Appendix IX samples shall be one foot in depth. This information will be used as part of a database on which to develop a post-closure monitoring network.

2.4.2 Laboratory Analysis

- A New York State technically acceptable laboratory must be used.
- The NYSDEC reserves the right to not accept any data from analyses performed by laboratories that do not meet the NYSDEC "technically acceptable" standards.

2.7 Health and Safety

- The Site Safety Plan (SSP) must be approved by NYSDEC and in place before any on-site work begins. In the applicants cover letter, it is stated that portions of the work will begin prior to regulatory approval. Therefore, it is unacceptable for the Site Safety Plan to be prepared by the closure contractor following closure plan approval and prior to closure.
- It is assumed that the 3 zones will be fully described in the SSP, as well as the levels of protection to be required at this site.

- Describe fully the method for preventing volatilization of the PCB's during closure.
- The SSP must present levels to be used in determining when safety monitoring is needed and what steps will be taken if safe levels are exceeded.

2.10 Post-Closure Plan

- Amend the second paragraph to state that post-closure care and monitoring shall continue until the post-closure permit is issued.

Appendix C - Preconstruction Activity

- Sediment samples for recharacterization should also be analyzed for metals and volatiles. If these are not found in the sludge, then it will not be necessary to analyze for them in the soil verification phase.
- Under "Evaluation of Construction Materials" it should note that all data compiled to evaluate design suitability must be reviewed and approved by NYSDEC.

Appendix E - Post-Closure Ground Water Monitoring Plan

2.01 Well Locations

- The maximum screen length that will be used in a single monitoring well installation must be stated. NYSDEC recommends a screen length of no more than ten feet.
- Soil samples should also be taken continuously and sampled for PCB's, volatiles and metals.

2.03 Analytical Requirements

- The entire scans should be run on the initial round of sampling (semivolatiles, BNAs and metals). Volatiles should be run on all RCRA wells during the accelerated program to rule out their presence.
- The upgradient well is not a compliance point well; it is a well used for comparison purposes to a compliance point well. 6 NYCRR 373-2.6 (f) describes the point of compliance more fully.

2.0.4 Monitoring Frequency

- The entire RCRA Monitoring well network is to be sampled on the accelerated program, not just the compliance well and the upgradient well. Samples will be analyzed for the site specific parameters listed in Section 2.0.3, plus volatiles, plus any parameters found in Appendix IX analyses.

- Following the accelerated 6 month program, all the wells shall be sampled quarterly until the post-closure permit is issued.

3.0.2 Sample Preservation and Shipment

- Metals analysis for the RCRA program must be total metals. Fisher may analyze total and soluble metals until sufficient data is generated that justifies using soluble metals.

The unfiltered samples to be analyzed for metals must also be preserved to a pH of <2 in the field.

4.0.1 Ground Water Elevation Assessment

- Groundwater elevations collected during the accelerated monitoring program must also be summarized on a data base table.

4.0.2 Ground Water Quality Assessment

- Replicates must be run on all parameters for those wells that will be used for statistical analysis. This includes the downgradient compliance point well and the upgradient wells.

4.0.3 Report Submittals

- Explain why data from the first and third quarters will not be used to prepare the annual report. 6 NYCRR 373.3 requires that an annual report be submitted by March 1 of the following year, until a Post-Closure permit is issued.

Appendix B - Monitoring Well Installation Protocol (Post-Closure Groundwater Monitoring.)

I. Drilling/Sampling Procedures

- Describe how the drilling rig and equipment will be decontaminated.
- Continuous samples shall be taken and analyzed.
- List what will each sample be analyzed for and the appropriate containers for each.

II. Monitoring Well Completion

- Further details must be provided on the well completion data, such as: length of screen, length of sand pack, protective apron etc. Provide a typical illustration.
- Describe the well development procedures.

Appendix D - Ground Water Sampling Procedures (Post-Closure Groundwater Monitoring.)

Materials

- Bottom filling bailers must be used to take samples to avoid aeration of sample.

Sampling Procedures Using a Bailer

- Total well depth must also be measured at the beginning of each sampling event.
- Continue bailing until three volumes have been removed and the pH and specific conductivity have stabilized.
- Explain how the purge water will be disposed.
- Samples for volatile analysis must be taken no more than three hours after the completion of purging.
- Measure the depth to water just prior to sampling to observe the recovery of the well.



STATE OF NEW YORK
DEPARTMENT OF
ENVIRONMENTAL CONSERVATION
ALBANY, NEW YORK 12233-1010

THOMAS C. JORLING
COMMISSIONER

JUL 7 1988

Dear Assemblyman Bragman:

The New York State Department of Environmental Conservation (NYSDEC) has not granted formal approval of General Motors Fisher Guide Division's Closure Plan for two impoundments at this site. However, through a series of meetings and other communications, the NYSDEC has allowed General Motors to consider placement of the Meadowbrook soils into Impoundment 1, if the facility elects under 6 NYCRR 373-3.11(f) to close their impoundments as a landfill and provide post-closure care under 6 NYCRR 373-3.14(d) and 373-3.7 respectively. The closure plan under review reflects the landfill option, and it sets a closure standard whereby unsaturated subsoils will be excavated until laboratory analysis confirms that less than 25 parts per million (ppm) of PCB's are present.

The Meadowbrook soils were previously sampled and all analytical results were below 50 ppm, the level at which PCB's are considered to be a hazardous waste under New York State Hazardous Waste Regulations. Those analytical results indicate average PCB concentrations of 6.7 ppm in the first 12 inch layer and of 0.15 ppm in the next six inch layer of Meadowbrook soils. These average PCB levels are below the closure performance standard of less than 25 ppm.

At this time, the plan allows for the placement of the Meadowbrook soils in the impoundment after a sufficient amount of fill material has been placed into the impoundment to assure that any PCB containing Meadowbrook soils will not contact the groundwater. In addition, a cap sufficient to minimize surface flow from entering the unit, as well as to restrict migration of vapors or gasses will be required. The unit will be monitored through a series of downgradient wells to detect any escape of hazardous constituents to the groundwater media. If any constituents are detected in the groundwater above standard criteria levels, corrective measures will be taken to remediate the problem.

If you have any further questions on this matter, please contact Ms. Leslie Stephenson, of my staff, at (518) 457-9696.

Sincerely,

Thomas C. Jorling

The Honorable Michael J. Bragman
New York State Assembly
Room 828
Legislative Office Building
Albany, New York 12248

bcc: Commissioner Jorling

L. Marsh

D. Banks

F. Murray

S. Weber

N. G. Kaul

D. Mafrici

P. Counterman

S. Kaminski

E. Miles

L. Stephenson

L. Whitbeck

E. Doering, EPA Region II

W. Krichbaum, Region 7

M. McPeck, Region 7



Onondaga County Legislature

JOHN E. GARLAND
COUNTY LEGISLATOR - 5TH DISTRICT
2500 BREWERTON ROAD
MATTYDALE, N.Y. 13211
TEL. RES. 454-3079
LEG. 425-2070
OFFICE 455-2456

May 25, 1988



Hon. Michael Bragman
305 South Main St.
North Syracuse, N.Y. 13212

Dear Mr. Bragman: *Michael*

This month the County Health Committee passed a resolution (copy enclosed) authorizing funds to remove PCB contaminated soil from the Meadowbrook basin plot and transport the material to the pond on the GM premises at Carrier Circle.

There is no plan to dispose of this material, merely to bury it in the pond -- apparently below the water table. The water table, no doubt, is the same in the pond as it is in nearby Ley Creek.

The PCB material is an oily substance. Oil floats in water. What is to prevent leachate into Ley Creek, once again?

A present situation at the plant should also be recognized, in that PCB material has been deposited under the floor of the plant, within the foundation walls and below the water table, and this condition hopefully is being monitored. The new deposit could only add to the risk.

State DEC has to approve the described plan. I ask that your office contact DEC to assure that the plan has been fully investigated as to the long term risk to the people who live in the area -- now and in the future.

The plan is to be voted on by the Legislature on June 6th, so an early response is requested.

Best personal regards,

John E. Garland

JEG/jr

RECEIVED

JUN 16 1988

Bureau of Hazardous Waste
Facility Permitting
Division of Hazardous
Substances Regulation

RECEIVED

JUN 16 1988

DIRECTOR'S OFFICE
DIVISION OF HAZARDOUS
WASTE REMEDIATION



THE ASSEMBLY
STATE OF NEW YORK
ALBANY

TCT Seg
cc: S. Weber

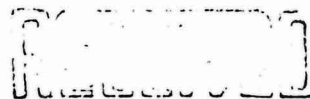
MICHAEL J. BRAGMAN
Assemblyman 118th District

305 South Main Street
North Syracuse, New York 13212
(315) 452-1044

Room 828
Legislative Office Building
Albany, New York 12248
(518) 455-4567

CHAIRMAN
Agriculture Committee
Subcommittee on
Wildlife Management

COMMITTEES
Environmental Conservation
Local Governments
Tourism, Arts & Sports
Development
Transportation



June 2, 1988

JUN 7 1988

Thomas Jorling, Commissioner
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233

Dear Commissioner Jorling:

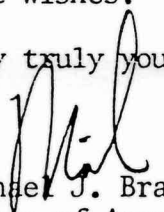
I have enclosed a copy of a May 25, 1988 letter (with attachment) from Onondaga County Legislator, John E. Garland, 2500 Brewerton Road, Mattydale, New York 13211. This correspondence, regarding the County's plan to remove PCB contaminated soil from the Meadowbrook Drive area, is self-explanatory.

Would you please review this matter and advise me if your department has approved this plan. Additionally, please provide me with any other information which would be helpful to Mr. Garland. Subsequent to receiving your response, I will be able to determine how I can be of further assistance to my constituent.

Thank you for your anticipated cooperation.

Best wishes.

Very truly yours,


Michael J. Bragman
Member of Assembly

MJB/lrp/tmb

Enclosures

cc: John E. Garland
William Krichbaum

Dated: June, 1988

Resolution No. _____

Motion made by Mr. Mitchell

AUTHORIZING THE REMOVAL OF PCB LADEN
SOIL FROM THE HOOKWAY TRACT ON
MEADOWBROOK DRIVE IN THE CITY OF SYRACUSE

WHEREAS, an investigation by the Environmental Health Division of the Onondaga County Health Department has revealed the presence of PCB's in soil located in a residential area on Meadowbrook Drive; and

WHEREAS, said PCB laden soil on Meadowbrook Drive represents a potential health hazard to those individuals who might be exposed to the contaminated soil; and

WHEREAS, the PCB laden soil originally came from Ley Creek; and

WHEREAS, the Fisher Guide Division of General Motors has agreed to take back the PCB laden soil to their facility; and

WHEREAS, pursuant to ongoing negotiations, General Motors has agreed to consider contributing to the cost of moving the PCB laden soil from Meadowbrook to Fisher Guide, and

WHEREAS, the Department of Environmental Conservation has approved of disposal of the PCB laden soil in this manner; now, therefore, be it

RESOLVED, that the Onondaga County Health Department be and hereby is authorized to make an expenditure not to exceed Thirty Thousand Dollars (\$30,000.00) for the purpose of removing the contaminated soil and thereby alleviating the currently existing health hazard; and be it further

RESOLVED, that the County Executive be and hereby is authorized to enter into a contract for an amount not to exceed Thirty Thousand Dollars (\$30,000.00) for the purpose of accomplishing said removal of PCB laden soil; and be it further

RESOLVED, that the County budget be amended as follows:

REVENUES

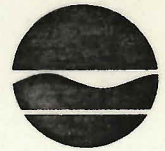
not yet

Administrative Unit 40-43-10-10
Environmental Health, Index 111083
In Account 0401, State Aid for
Public Health Work
In Account
Contribution to Environmental
APPROPRIATIONS
Expenditure for County Health
Expenditure for County Health
Contribution to Environmental
IN THE OFFICE OF THE COUNTY CLERK
Environmental Health, Index 111083

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New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-



Thomas C. Jorling
Commissioner

OCT 16 1987

Mr. Richard J. Larkin
Manager
Manufacturing Engineering
Fisher Guide Division
General Motors Corporation
1000 Town Line Rd.
Syracuse, NY 13221-4868

Dear Mr. Larkin:

The New York State Department of Environmental Conservation has reviewed the Closure Plan submitted by the above facility dated June 8, 1987 and has found the Plan to be incomplete. There is a significant lack of background information in the Plan that is needed to proceed with the technical review. These items include; sludge characterization, geologic and hydrogeologic characterization, and sludge solidification/stabilization.

TSCA (Toxic Substances Control Act) requires, under their approval to SCA and CECOS, that each transport vehicle be sampled for PCB concentrations to assure that they are under 500 ppm. This is most often a requirement of the generator. Although GMC provided analytical results of sludge testing performed, the sampling procedures were not adequate to properly characterize the impoundment contents.

A complete characterization would entail core samples for visual inspection to delineate possible changes in sludge or horizons of oils, etc. with analytical samples taken at various levels and/or changes in material. Samples should not be composited as proper disposal is based on "worst case" conditions and compositing may not give a true picture of sludge condition. "Representative" sampling for a spill is 20-30 samples. This is a good rule-of-thumb for each impoundment. Consideration should be given, however, to the statistical significance of the 20-30 based on the larger impoundment.

71
1
Dan Kraft

In addition to the above, GMC should provide a detailed explanation of how the sludge/soil horizon shall be determined. If a broad horizon is found rather than a clear sludge/soil interface, GMC should explain how the interface will be determined. This definition is important as soils do not have to be sampled for PCB's for approval to be landfilled as sludges do. As a point of information, New York State requires PCB's to be handled and disposed of in accordance with Federal in addition to State hazardous waste regulations. These Federal regulations may require removal beyond the 50 ppm level depending upon more detailed information concerning the units as well as health and safety standards.

Related to the characterization of the sludge are solidification/stabilization methods. In order to be accepted by a commercial landfill facility the sludge must not contain any free liquids. The Closure Plan states that a pozzolanic reagent is to be added to the sludge for solidification and that a sufficient amount will be utilized to hydrate free liquids. The Plan does not, however, state how a "sufficient" amount will be determined. The applicant will need to perform benchscale tests to assure that the proper amount of reagent is added. In addition, details concerning how the materials will be mixed to assure homogeneity needs to be addressed. SCA and CECOS will both require testing to assure that the sludge does not contain free liquids. Therefore, it would be beneficial to GMC to conduct preliminary testing of solidified materials (paint filter test) to be sure the material would be acceptable to the commercial facility.

6 NYCRR Section 373-3.6 requires all RCRA land-based units to install and sample, on a regular basis, a groundwater monitoring system. This system must provide for immediate detection, in the uppermost aquifer, of leakage from the regulated units that may occur. GMC Fisher must perform a hydrologic investigation and then install and monitor a system that meets the intent of 6 NYCRR Section 373-3.6. A meeting to discuss this investigation and groundwater monitoring system should be arranged as soon as possible.

If you have any questions concerning the Closure Plan, call Ms. Leslie Stephenson at (518) 457-9696. To set up the meeting to discuss the groundwater issues, call Ms. Luanne Whitbeck at (518) 457-9255.

Sincerely,



Paul R. Counterman, P.E.

Chief

Bureau of Hazardous Waste Technology

Division of Hazardous Substances Regulation

cc: F. Langone
L. Whitbeck
L. Stephenson
M. McPeck
L. Gross

**FISHER
GUIDE**

Fisher Guide Division
General Motors Corporation

1000 Town Line Road
Syracuse, New York 13221-4869

SJK

Syracuse Plant

RECEIVED

AUG 29 1988

Bureau of Hazardous Waste
Facility Permitting
Division of Hazardous
Substances Regulation

PEL: ER88-076

August 26, 1988



Mr. Paul R. Counterman, P.E., Director
Bureau of Hazardous Waste Facility Permitting
Division of Hazardous Substances Regulation
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233

Re: Surface Impoundment Closure Plan
EPA ID NY002239440

Dear Mr. Counterman:

We are in receipt of your letter of July 15, 1988, commenting on the third draft of the closure plan, dated April, 1988, which was forwarded to you under cover of our letter of May 10, 1988. This draft followed a face-to-face technical meeting between our consultants and Department representatives in Albany on March 23, 1988 and the understanding reached were noted in our letter to you of March 30, 1988. Later informal discussions with representatives of your staff led us to believe that any further revisions required to be made to the plan would be few in number and minor in scope.

Given the foregoing, it was discouraging to find that NYDEC had over 40 comments on this latest draft. Many of the comments could have been made on earlier drafts of the plan and several of the comments have no technical or regulatory justification.

Fisher Guide remains committed to the process for gaining approval of a closure plan, and to that end, has submitted the enclosed addendum, responding to NYDEC's comments.

Paul R. Counterman, P.E.
August 26, 1988
Page 2

We would like to have a meeting on this matter as soon as possible after Labor Day. At this meeting, we want to address any remaining concerns and resolve certain disposal issues arising from the results of our recent recharacterization of the impoundment sediments.

As to the latter item, it was agreed at the March 23, 1988 Albany meeting that the NYDEC's demand for recharacterization of the sediments would be limited to re-sampling for PCBs. To accelerate the project, the work was performed in early July. Michael McPeck, an Engineer in NYDEC's Region 7 office, was on-site to review the sampling procedures. The results were recently received and they indicate areas of PCB contamination in excess of 500 ppm (wet weight) in impoundment #1. Attached to the Addendum is a copy of the analytical report and a sketch of the impoundments showing sampling locations.

We are re-examining our closure plan in view of these analytical results and would like to review with you our judgments as to how we should proceed. Secure landburial of the impoundment sediments remains the only viable disposal option if we are to complete the construction closure activities this calendar year.

Also, we understand from the list of indicated carbon copies on your July 15 letter that the EPA is involved in the review of this matter. Please advise if the EPA will need to be more formally involved, given the finding of PCB contamination in excess of 500 ppm in Impoundment #1.

By this letter, we also would like to bring the following closure related items to your attention:

1. Groundwater Monitoring Wells. As you know, the closure plan includes a proposed system of groundwater wells to meet "interim status" regulatory requirements. Fisher Guide has held off installing groundwater monitoring wells, given it's understanding that NYDEC wanted to approve the wells in the context of the closure plan. However, in our May 10, 1988 letter, we requested NYDEC approval to proceed with the installation of the wells prior to approval of the closure plan.

Paul R. Counterman
August 26, 1988
Page 3

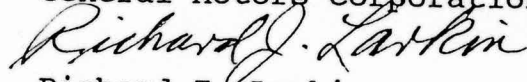
Given the status of this matter, we believe it is in the best interest of the project to proceed now with the installation of the wells in accordance with the latest draft of the closure plan, as modified by the enclosed addendum. O'Brien & Gere has set the week of September 19, for installing these wells. The NYDEC representative who wishes to oversee the installation should contact John Tomik of O'Brien & Gere to confirm the actual date and time for commencement of this work.

2. SEOR Process. In our letter to you of May 10, 1988, we noted that Fisher Guide will need to obtain two local agency approvals for the closure project. Applications have not yet been finalized as we await NYDEC approval of the final closure plan. Please confirm that NYDEC approval of the closure plan is the only approval/permit required from the Department and that NYDEC will be conducting the environmental review as lead agency.

We will contact your office next week to set up a mutually convenient date and time for the meeting. Your courtesies will be appreciated.

Very truly yours,

FISHER GUIDE DIVISION
General Motors corporation



Richard J. Larkin
Manager
Manufacturing Engineering

cc: Steve Kaminski, P.E. (w/enclosure)
Frank V. Bifera, Esq. (w/enclosure)
G. Michael McPeck (w/enclosure)
Mr. Joseph Barry (w/enclosure)

SURFACE IMPOUNDMENT CLOSURE
AND POST-CLOSURE PLAN

GENERAL MOTORS CORPORATION
FISHER GUIDE DIVISION
SYRACUSE, NEW YORK
(NYD002239440)

Submitted to:

New York State Department of
Environmental Conservation
Albany, New York

26 April 1988

Prepared by:

WESTON SERVICES, INC.
100 Corporate North, Suite 101
Bannockburn, Illinois 60015
(312) 295-6020